

NLU Delhi Anti-Sexual Harassment Regulations, 2025

Prepared by Anti-Sexual Harassment Policy Committee

(comprising Prof. (Dr.) Ritu Gupta, Prof. Amita Punj, Ayan Garg and Vedika Chawla)

Approved by Executive Council on: 19/02/2025

Effective as on: 07/03/2025

In exercise of the powers conferred by and in discharge of the duties assigned under the relevant provisions of the National Law University Delhi Act, 2007 (Delhi Act No. I of 2008), the Executive Council hereby introduces the following Regulations:

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Part I: Introduction

1. Scope

- a. The NLU Delhi Anti-Sexual Harassment (ASH) Regulations (hereinafter ‘Regulations’) shall apply to all instances of sexual harassment:
 - i. occurring on the NLU Delhi campus as defined herein, irrespective of the parties; or
 - ii. occurring between or among members of the NLU Delhi community as defined herein, irrespective of location;
 - iii. occurring between a third party and a member of the NLU Delhi community, where such third party is the complainant, and where the complaint is brought in relation to such member’s involvement in an activity pertaining to the University, irrespective of location.

2. Definitions

- a. In these Regulations, unless the context otherwise requires,
 - i. ‘aggrieved person(s)’ shall mean any person(s) alleging an incident of sexual harassment under these Regulations,
 - ii. ‘complainant(s)’ shall be any aggrieved person(s) who files a complaint, or on whose behalf such complaint is filed, under Regulation 16,
 - iii. ‘Functionaries’ in these Regulations shall refer to the functionaries provided for under Part IV and shall include the ASH Policy Advisor, the ICC, the Facilitators and the Gender Champion(s),
 - iv. ‘Gender Champions(s)’ shall refer to the student(s) as appointed under Regulation 12,
 - v. ‘Internal Complaints Committee’ or ‘ICC’ shall refer to the Committee constituted by the University under Regulation 8,
 - vi. ‘ICC Rules’ shall refer to the Rules Governing the functioning of the Internal Complaints Committee constituted by the University Under the University Grants Commission (Prevention, Prohibition and Redressal of Sexual Harassment of Women employees and students in Higher Education Institutions) Regulations, 2015,
 - vii. ‘NLU Delhi’ or ‘University’ shall refer to National Law University Delhi,

- viii. 'NLU Delhi campus' shall include the premises of the University,
- ix. 'NLU Delhi community' shall include all students, faculty, employees and any person providing any service at/to the University at any given point in time,
- x. 'PoSH Act' or 'Act' shall refer to the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013,
- xi. 'PoSH Policy' shall refer to the National Law University Delhi Policy on Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) of 2019,
- xii. 'Recruitment Coordination Committee' or 'RCC' shall refer to any committee or group of individuals formally constituted within the University for the purpose of coordinating internships and recruitment,
- xiii. 'respondent' shall mean any person against whom a complaint has been filed under Regulation 16,
- xiv. 'sexual harassment' shall mean and include any unwelcome conduct or act (verbal, physical, textual, electronic, visual or graphic) or threat of a sexual nature, which may occur in a singular instance or be persistent, and shall include:
 - i. any physical contact or advance,
 - ii. any advances, demands or requests for sexual favour,
 - iii. sexually coloured communication, verbal, written or otherwise, that is targeted at a person or group of persons,
 - iv. sharing sexually explicit content or making such gestures,
 - v. sharing or showing pornography,
 - vi. any single or repeated sexually determined behaviour or conduct that creates an intimidating or hostile work environment,

Explanation 1: Conduct covered under this definition includes acts directed towards a person, acts done in a person's presence, and acts done maliciously in relation to a person.

Explanation 2: Characterisation of conduct as 'unwelcome' is to be determined on the basis of whether the aggrieved person had expressly or impliedly consented to such conduct;

Provided that the silence or lack of protest by the aggrieved person at the time of such conduct or thereafter shall not by itself be construed as consent.

Explanation 3: Creation of a 'hostile environment' includes any conduct which demeans, humiliates, offends or intimidates the aggrieved person, or is intended to induce submission by actual or threatened adverse consequences, and may be accompanied by:

- i. implied or explicit promise of preferential treatment in employment/education,
 - ii. implied or explicit threat of detrimental treatment in employment/education, or
 - iii. implied or explicit threat about their present or future employment/education status,
- xv. 'student' shall include any person enrolled or registered for any full-time or part-time course or programme or part thereof conducted or organised by NLU Delhi, including distance-learning programmes and exchange programmes,
- xvi. 'support person' shall refer to such person as appointed under Regulation 28,
- xvii. 'third party' shall refer to any person who is not member of the NLU Delhi community,
- xviii. 'transgender person' shall have the same meaning as defined under the Transgender Persons (Protection of Rights) Act, 2019,
- xix. 'UGC Guidelines' shall refer to the University Grants Commission (Prevention, prohibition and redressal of sexual harassment of women employees and students in higher educational institutions) Regulations, 2015 as notified on 2 May, 2016.
- b. Words and expressions not defined herein shall have the same meaning assigned to them in the NLU Delhi Act, 2007 or rules or regulations made thereunder, or the PoSH Act, or the UGC Regulations, or other instrument as the context requires.

3. Prohibition of Sexual Harassment

Sexual harassment is prohibited and shall be dealt with in accordance with these Regulations.

4. Obligations of the University

a. The University shall:

- i. ensure a safe working and educational environment at all times,
- ii. proactively work towards sensitising all members of the NLU Delhi community towards issues of individual integrity, dignity, personal boundaries, etc. through workshops, orientation sessions, and any other means deemed fit,
- iii. conduct orientation sessions for all members of the NLU Delhi community to familiarise them with these Regulations,
- iv. circulate and display at conspicuous places in the University a list of phone numbers or other contacts of first response mechanisms which may be contacted in case of emergencies,
- v. circulate and display at conspicuous places in the University the penal consequences of sexual harassment, the orders appointing various Functionaries under these Regulations, and any other relevant information under these Regulations or otherwise,
- vi. delegate responsibilities to appropriate persons to undertake periodic surveys among students, staff and faculty to find out the extent of the problem and prevailing attitudes regarding all aspects of sexual harassment,
- vii. provide assistance to the aggrieved person in accessing professional counselling and medical services, if required,
- viii. provide necessary support to the aggrieved person in case they choose to file a complaint under penal laws in force at the time,
- ix. cause to initiate action, under the Indian Penal Code or any other law for the time being in force, against the perpetrator, or if the aggrieved person so desires, where the perpetrator is not an employee, in the workplace at which the incident of sexual harassment took place,
- x. treat sexual harassment as a misconduct under the service rules and initiate action for such misconduct,
- xi. ensure that any instance of sexual harassment, reported under these Regulations or otherwise, has ended,

- xii. ensure that all members of the NLU Delhi community have access to mental health services which adequately provide support for the specific mental health issues in relation to or arising out of sexual harassment,
 - xiii. ensure effective implementation of these Regulations, including through timely appointment of functionaries.
- b. The University shall perform the following obligations in order to ensure effective functioning of the ICC under these Regulations:
- i. provide all necessary facilities such as office space, computer, secretarial assistance etc., any information required by the ICC and other possible assistance to the ICC for smooth conduct of inquiry proceedings,
 - ii. assist in securing the attendance of respondent and witnesses before the ICC, if so requested/required by the ICC,
 - iii. pay appropriate reasonable amount as honorarium along with travel allowance to the external member for attending the ICC meetings,
 - iv. monitor the timely submissions of the Report(s) by the ICC,
 - v. forward any complaints of sexual harassment received to the ICC.

Part II: Functionaries

5. ASH Training

- a. All Functionaries provided for under this Part, including the ASH Policy Advisor, ICC members, Facilitators, and Gender Champion, as well as any other persons found suitable by the University, shall be required to undergo mandatory anti-sexual harassment training ('ASH Training') for awareness, sensitization, and capacity building in the areas of gender, sex, sexuality, and sexual harassment.
- b. The University shall conduct the ASH Training in collaboration with non-governmental organisations (NGOs), working in the relevant fields and possessing experience of conducting similar trainings.

6. Appointment of ASH Policy Advisor

- a. The Vice-Chancellor shall appoint a faculty member familiar with the issues relating to sexual harassment, to act as the ASH Policy Advisor (hereinafter 'ASH Policy Advisor' or 'Policy Advisor').
- b. The Policy Advisor shall hold the office for a term of three (3) years.

7. Powers and Duties of ASH Policy Advisor

a. The Policy Advisor shall:

- i. assist the University in ensuring compliance with the mandate prescribed in Section 19 of the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013, and applicable UGC Regulations, or any relevant law in force,
- ii. ensure implementation of these Regulations in NLU Delhi and annually review the functioning and effectiveness of the Regulations,
- iii. formulate strategies for spreading awareness of present Regulations among all members of NLU Delhi,
- iv. ensure the proper constitution, training and functioning of the ICC along with the Vice-Chancellor,
- v. identify and monitor support structures provided by the University to prevent and address sexual harassment and provide suggestions for improving their functioning and effectiveness,
- vi. organize orientation workshops for all faculty, non-teaching staff and students at the beginning of the year; and regular sensitization programs as s/he deems fit,
- vii. actively take cognisance of and appropriately respond to any concerns among the members of the NLU Delhi community in relation to sexual harassment,
- viii. assist the aggrieved person in relation to matters under these Regulations,
- ix. supervise the functioning of Facilitators appointed under these Regulations,
- x. take appropriate action when an alleged instance of ongoing sexual harassment is brought to her notice which involves immediate and serious threat to the NLU Delhi community,
- xi. ensure, if requested by any aggrieved person, that the aggrieved person is able to access the mental health services provided by the University,
- xii. upon receipt of the semester-wise report from the Gender Champions and Facilitators, duly consider the same and recommend to the Vice-Chancellor the issuance of certificates to the Gender Champions and Facilitators upon completion of their term,

- xiii. exercise such other powers and perform such other duties as may be conferred or imposed on them by or under these Regulations or are necessary to carry out the objectives of these Regulations.

8. Constitution of Internal Complaints Committee

- a. The Vice-Chancellor shall, by an order in writing, constitute the Internal Complaints Committee (hereinafter 'ICC' or 'Committee') in accordance with this Regulation.
- b. The Committee shall consist of the following members to be nominated by the Vice-Chancellor:
 - i. a Chairperson who shall be a senior level woman faculty member-not below the rank of Professor,
 - ii. two members out of the faculty members who have legal knowledge or expertise in the subject,
 - iii. two members out of the staff/non-teaching employees who have knowledge or experience in the subject,
 - iv. one or two external member(s) familiar with the issues of sexual harassment from governmental/semi-governmental or non-governmental organization,
 - v. three student representatives, one each from graduate, post-graduate and research streams respectively,
- c. In a dispute relating to faculty, representatives from non-teaching employees and students will not be the part of ICC during the resolution of complaint or during inquiry proceedings.
- d. In a dispute relating to non-teaching employees, representatives from students will not be the part of ICC during the resolution of complaint or during inquiry proceedings.
- e. At least half of the members of the ICC shall be women.

9. Removal from the ICC

- a. A member of the ICC shall be removed from the Committee if:
 - i. they have disclosed the identity of the parties and witnesses or details of the proceedings to the public, press or media in any manner in violation of Section 16 of the PoSH Act; or

- ii. is convicted of an offence or misconduct or is subject to a pending inquiry for any offence under law or misconduct; or
 - iii. has abused their position so as to render their continuance in office prejudicial to the public interest.
- b. The removal of a member under this Regulation shall lead to the creation of a vacancy to be filled within ten working days of creation of such vacancy in accordance with the procedure laid down in Regulation 8.

10. Appointment of Facilitators

- a. The University shall, within one week of the beginning of every even semester, circulate a call for volunteers for the positions of Facilitators to assist in the enforcement of the objectives of these Regulations.
- b. The Vice-Chancellor shall constitute a Selection Committee of a minimum of three faculty members to appoint Facilitators.
- c. The Selection Committee shall circulate within the NLU Delhi community the list of persons volunteering for the positions of Facilitators, and may consider written objections, if any, with respect to any volunteer.
- d. Volunteers who successfully undergo anti-sexual harassment training as provided for under Regulation 5 may be selected and appointed as Facilitators by the Selection Committee, within one month of beginning of the semester.
- e. At any given point in time, there shall be at least fifteen (15) Facilitators, among which there shall be:
 - i. at least ten from the B.A.LL.B. (Hons.) course, which shall be equally distributed across batches as far as possible,
 - ii. at least two from the LLM batch,
 - iii. at least one from Faculty,
 - iv. at least one from non-teaching staff, and
 - v. at least one from the research community;

Provided that a minimum of fifty percent of the Facilitators shall be females, and as far as possible, spread across each category of members of the NLU Delhi community as indicated in this Regulation.

- f. Facilitators shall hold office for a term of one (1) year.

- g. After the successful completion of their term and on recommendation of the Policy Advisor, Facilitators shall receive a certificate from the Vice-Chancellor acknowledging their contribution under these Regulations.

11. Duties of Facilitators

- a. Facilitators shall act as the first point of contact for any member of the NLU Delhi community, including those taking or seeking to take recourse under these Regulations, in matters relating to sexual harassment and provide them with support as required, including:
 - i. assist in clarifying the nature of the concern,
 - ii. give information on options available and possible outcomes under these Regulations,
 - iii. explore possible strategies and options available in resolving the situation,
 - iv. assist in drafting and filing of a complaint,
 - v. explore strategies to safeguard persons against victimization,
 - vi. support the aggrieved person throughout any stage of the resolution process,
 - vii. provide information on other relevant internal/external remedies, and any limitation periods that may apply to such remedies,
 - viii. ensure that the aggrieved person is able to access the mental health services provided by the University,
 - ix. whether or not a person files a formal complaint, provide immediate support as needed.
- b. Facilitators shall assist the Policy Advisor in formulating and operationalising preventive measures against sexual harassment, including:
 - i. conducting workshops, conferences and other events,
 - ii. spreading awareness among and sensitisation of the NLU Delhi community in matters relating to sexual harassment,
 - iii. spreading awareness regarding the institutional mechanisms relating to sexual harassment in the University through orientations, dialogue or otherwise,

- c. Facilitators shall be required to maintain complete confidentiality of the identities of all parties and witnesses involved in a complaint, of all proceedings, or of any other information received by them in their capacity under these Regulations,
- d. Facilitators shall actively collaborate with the Gender Champions in their activities,
- e. Facilitators shall submit a written report of activities undertaken by them to the ASH Policy Advisor and the ICC on a monthly basis.

12. Removal of Facilitators

- a. A Facilitator may be removed if:
 - i. they act in contravention of these Regulations, the UGC Regulations, or against the spirit of the same, or
 - ii. a finding of guilt in a complaint of sexual harassment is made against the Facilitator;

Provided that where a complaint of sexual harassment has been lodged against a Facilitator, the Facilitator shall be suspended temporarily during the inquiry proceedings, and shall be removed permanently if the ICC finds that they have committed sexual harassment.

13. Appointment and Functioning of the Gender Champions

- a. The University shall appoint two Gender Champions, which shall include one person each from the Men's Halls of Residence and the Women's Halls of Residence, upon the recommendation of a Selection Committee constituted by the Vice-Chancellor, which shall have at least two (2) female faculty members not below the rank of Professor.
- b. The Selection Committee shall circulate within the NLU Delhi community the list of persons in consideration for the positions of Gender Champions, and may consider written objections, if any, with respect to any person.
- c. The Selection Committee shall follow a fair procedure in recommending names of students for the position of Gender Champions and shall consider the following qualities to be demonstrated by a student:
 - i. experience in the field of gender equality and sensitization;
 - ii. possession of excellent presentation, leadership, and organisational skills;
 - iii. ability and willingness to devote adequate time to their duties.

- d. A Gender Champion may be removed from their office at any time by the University, upon the considered opinion of the Vice-Chancellor, formed after a fair inquiry, that they have committed acts seriously antithetical to their position as Gender Champion.
- e. A Gender Champion shall hold office for a term of one (1) year.
- f. After the successful completion of their term and upon recommendation by the Policy Advisor, the Gender Champions shall receive a certificate from the Vice-Chancellor acknowledging their contribution to the creation of a gender-sensitive environment in NLUD.

14. Duties and Responsibilities of the Gender Champions

- a. The Gender Champions shall act as advocates for the creation and sustenance of a gender-sensitive environment in NLUD, by:
 - i. organising public events aimed at fostering a sense of community around gender issues,
 - ii. identifying instances of gender discrimination in the University and bringing them to the attention of university authorities,
 - iii. sensitising their peers about gender issues by, *inter alia*, organising external sessions, workshops, and other such events.

Provided that the preceding list of duties and responsibilities is not exhaustive, and does not exclude the possibility of further duties and responsibilities being affixed upon the Gender Champions by the University.

- b. The Gender Champions, with contributions and support from Facilitators, shall submit a written report to the Policy Advisor at the end of every academic semester, detailing:
 - i. the work performed by the Gender Champions and Facilitators for creation and promotion of a safe and gender-sensitive environment,
 - ii. a comprehensive review of the undertaken measures, including their effectiveness, failings, and suggestions for improvement,
 - iii. other observations and findings relevant for the purposes of these Regulations.

15. Annual Report by the ICC

At the end of every academic year, the ICC shall submit an Annual Report giving an account of the cases heard by the Committee, their disposal, and any other relevant details, to the ASH Policy Advisor and the Vice-Chancellor.

Part III: Redressal Procedure

16. Filing of Complaint

- a. An aggrieved person may, following an incident of sexual harassment, file a written complaint to the ICC within three months from the date of the incident, or in case of sexual harassment occurring through a series of incidents, within three months from the date of the last incident;

Provided that upon a request for the same by the complainant, the ICC may, through a reasoned order, extend the deadline for the filing of a complaint by a period not exceeding three months.

- b. The complaint shall be filed in writing, either online or as a hard copy, either in the format as provided in Annexure A or in any other suitable format.
- c. The complaint shall be specific, as far as possible, and shall include witness statements and a list of witnesses, if any.
- d. The ICC shall extend all reasonable assistance to the complainant for submitting the written complaint, if so requested.
- e. In case of complaints made in hard copy, the complainant, or any person acting on their behalf, shall submit the complaint to the ICC's office by physically handing it to a Facilitator or ICC Member.
- f. In case of online complaints, the complaint shall be submitted via email to the ICC email address;

Provided that the complaint shall be considered as duly submitted to the ICC even if it is submitted to other University functionaries via the same email.

17. Procedure upon Receipt of a Complaint

- a. Upon receipt of a complaint, the ICC shall establish whether it has *prima facie* jurisdiction over the complaint within three working days.

- b. For the purposes of establishing *prima facie* jurisdiction, the ICC may request the complainant, or the person through whom the complaint was filed, to furnish any further information.
- c. After reaching a decision on its *prima facie* jurisdiction over the complaint, the ICC shall communicate its decision to the complainant, in a reasoned order, within one working day.

Provided that the complainant may appeal against an adverse decision to the ICC within seven working days of its receipt; the appeal shall be considered and disposed of by the ICC within five working days of its receipt.

- d. Upon establishment of the *prima facie* jurisdiction of the ICC:
 - i. if the complainant requests, in writing, for the ICC to initiate conciliation proceedings to settle the matter between the parties, the ICC shall initiate the conciliation process as specified in Part V.II below,
 - ii. in the absence of a request for conciliation by the complainant, the ICC shall initiate the inquiry process as specified in Part V.I.

III.I: Inquiry

18. Procedure and Timeline for Inquiry

- a. Upon initiation of the inquiry process, the ICC shall issue notice of the same to the respondent, including a copy of the written complaint, within seven working days.
- b. Upon receipt of the notice, the respondent shall submit a written reply to the ICC within ten working days;

Provided that the written reply should be specific, as far as possible, and shall include witness statements and a list of witnesses, if any.

- c. At any time after receipt of the complainant's written complaint, including before receipt of the respondent's written reply, the ICC may call the complainant for hearing and/or recording of their handwritten statement.
- d. Upon receipt of the respondent's written reply, the ICC shall issue a copy of the same to the complainant within three working days.
- e. Upon issuance of the copy of the respondent's written reply to the complainant, the ICC shall hold oral hearings of the parties and witnesses within five working days.

- f. If any party absents themselves from three consecutive oral hearings without providing the ICC prior reasons in good faith for their absence, the ICC may conclude the oral hearings without affording further opportunities to the absent party to be heard.

Provided that the ICC shall issue a written notice to the parties communicating its decision to conclude the oral hearings at least seven working days before finally concluding oral hearings, so as to allow the absent party an opportunity to address and clarify their absenteeism.

- g. Upon conclusion of the oral hearings, the ICC shall submit its Inquiry Report to the Vice-Chancellor and simultaneously issue copies of the same to the complainant and respondent, within seven working days.
- h. Upon submission of the Inquiry Report, the ICC shall have no further jurisdiction over the complaint and may not entertain any communication from any party or witness in the complaint.
- i. The inquiry proceedings shall be concluded as expeditiously as possible and, in any case, within ninety working days.

19. Oral Hearings

- a. The ICC shall hold all oral hearings of parties and witnesses in safe and closed spaces to ensure the comfort of the parties.
- b. The ICC shall ensure, as far as possible, that the parties are not present in the oral hearings at the same time.

Provided that if both parties have to be present at the same time, the ICC shall ensure that they are not made to sit face-to-face, unless it is deemed absolutely necessary and the complainant consents to the same.

- c. The ICC shall facilitate the cross-examination of witnesses by the parties and ensure that such cross-examination is fair.

20. Collection and Recording of Evidence

- a. At any stage of the proceedings, the ICC may call upon parties and witnesses to furnish any further relevant information to it, in any form deemed necessary.

Provided that requests to furnish information shall, as far as possible, include the reasons for the demand of any specific information.

- b. The ICC may record statements of parties and witnesses made before it, and treat these statements as having been made on oath or affirmation of truth.
- c. The ICC may require parties and witnesses to provide handwritten statements of matters stated in oral hearings, and shall provide due assistance to anyone finding it difficult to prepare such handwritten statements.
- d. Members of the ICC may take minutes and notes, as deemed appropriate, of all proceedings, including oral hearings, which shall be strictly for internal use only, may not be shared with anyone outside the committee, and must be destroyed upon exhaustion of the ICC's jurisdiction over the complaint.

21. Interim Relief

- a. During pendency of the inquiry, on a written request made by the complainant, the committee may recommend to the university to grant interim relief, including:
 - i. transfer the complainant or the respondent to any other department or section,
 - ii. where the complainant is an employee of the University, grant leave of up to three (3) months,
 - iii. where the complainant is a student, grant attendance relaxation to the extent as may be permissible under regulations for the time being in force,
 - iv. where the complainant is a student, permit the complainant to forfeit their participation and representation of the university in any external event, including moot court competitions and ADR competitions, without facing any penalty for such forfeiture,
 - v. allow reasonable accommodations, including shifting of rooms, within the Halls of Residence;
 - vi. prevent the respondent from assessing complainant's work performance or to transfer him/her to any other department or section,
 - vii. grant such other relief as may be appropriate.
- b. Once the recommendations of interim relief are implemented, the university will inform the committee regarding the same.

22. Preparation of the Inquiry Report

- a. The Inquiry Report prepared by the ICC shall include:

- i. findings relating to the impugned incident,
 - ii. decision upon the respondent's guilt, i.e., whether the respondent committed sexual harassment or not,
 - iii. in cases where guilt is established, the recommended penalties under Regulation 23.
- b. The ICC, while preparing the Inquiry Report, shall consider all relevant factors including:
 - i. any previous accounts of harassment pertaining to either party,
 - ii. whether the respondent is in a position of authority, supervisory, evaluative or otherwise, over the complainant, and
 - iii. other cases filed before any other fora/agency/department, the result or report, and whether such cases had legal grounding.
- c. The past sexual history of either party shall not be taken into account by the ICC while arriving at a decision.

23. Penalties

- a. The ICC may recommend to the Registrar and the Vice-Chancellor the imposition of any, or a combination, of the penalties provided under this Regulation in case the inquiry into a complaint ends in a positive finding against the respondent in the alleged incident of sexual harassment.
- b. Upon receipt of the Inquiry Report, the University shall impose the recommended penalties within thirty days.
- c. Where the respondent is a student, the University may:
 - i. issue warning, reprimand, or censure, which may be oral or in writing,
 - ii. order the student to submit a written apology to the complainant,
 - iii. withhold certain privileges such as scholarships, allowances, and access to Halls of Residence for a specified period of time,
 - iv. share the finding with the Recruitment Coordination Committee (RCC), with instructions as provided for under Regulation 31;
 - v. bar the student from attending and participation in University events, including cultural and sports events for a specified period of time,

- vi. bar the student from contesting elections for Committee-Executives of Student Bar Council Committees as under Article 4(6)(b) of the Student Bar Council Constitution for a specified period of time,
 - vii. bar the student from holding any other positions within the University,
 - viii. bar the student from representing the University at any external conferences, courses or competitions, including ADR competitions, moot court competition, sports fests, debate competitions, etc. for a specified period of time,
 - ix. bar the student from taking specified examinations in the University,
 - x. suspend the student from the University or restrict entry to the NLU Delhi campus for a specified period of time,
 - xi. expel the student from the University, and deny readmission, if the case so desires,
 - xii. award reformatory punishments like mandatory counselling and/or performance of community service such as providing assistance in the library or cleaning parts of the NLU Delhi campus.
- d. Where the respondent is an employee of the University, the University may:
- i. where the complainant is a student of the respondent, order alternate arrangements to be made to ensure that no academic evaluations of such complainant are conducted by the respondent,
 - ii. take any appropriate disciplinary action under service rules, UGC Regulations or other applicable rules,
 - iii. issue warning, reprimand or censure, which may be oral or in writing,
 - iv. order the employee to submit a written apology to the complainant/aggrieved person,
 - v. withhold increment or defer promotion for a specified period,
 - vi. impose a fine of up to Rs 20,000/- which amount shall be paid into a separate account to be maintained by the ASH Policy Advisor and which amount shall be used to achieve the objectives of these Regulations,
 - vii. suspend the employee for a specified period,
 - viii. terminate the services of the employee.

- e. Where the respondent is a third party, the University may:
 - i. issue warning, reprimand or censure, which may be oral or in writing,
 - ii. bar such person from entering the NLU Delhi campus for a specified period of time,
 - iii. withdraw certificate or reward for participation in or successful completion of any conference, competition, seminar, programme etc. organised by the University or in the NLU Delhi campus,
 - iv. take any other appropriate action under applicable rules in the University.
- f. Where the respondent is a third party, the University shall also inform the institution or employer of such third party of the fact of the finding and of the penalty imposed.
- g. The complainant shall be entitled to be paid compensation by the respondent, on recommendation of the ICC and after approval of the Vice-Chancellor, which may be determined on the basis of:
 - i. mental trauma, pain suffering and distress caused to complainant,
 - ii. loss of career opportunities due to the incident of sexual harassment,
 - iii. medical expenses incurred by the victim for physical or psychiatric treatment,
 - iv. income and status of the respondent, and
 - v. feasibility of such payment as a single sum or in instalments.

24. Appeals

- a. The University shall constitute an Appeals Committee, consisting of the Vice-Chancellor and two senior faculty members.
- b. Upon receipt of the Inquiry Report, any party may file an appeal against the Inquiry Report to the Appeals Committee constituted by the Vice-Chancellor within thirty working days;

Provided that the Appeals Committee may allow an appeal to be filed after thirty working days via a reasoned order if it is satisfied that there is a reasonable justification for the delay.

- c. The appeal filed must be specific, as far as possible, and clearly list the grounds for appeal which include *inter alia* gross procedural irregularities, wrong findings on

facts, misinterpretation of evidence and disproportionality of recommendations, but which do not include technical procedural irregularities or leading of new evidence.

- d. After the appeal has been filed and during its pendency, any operative penalties on the respondent are temporarily suspended from operation.
- e. Upon receipt of the appeal, the Appeals Committee shall dispose of it by upholding, striking down, or modifying the ICC's findings and penalties within seven working days.
- f. The Appeals Committee shall send a written, reasoned order to both parties within two working days of its decision.
- g. Save as otherwise provided under any law for the time being in force, no further appeal shall lie to the decision of the Appeals Committee.

III.II: Conciliation

25. Provisions Relating to Conciliation

- a. At any time during the inquiry proceedings, the complainant may initiate conciliation proceedings by submitting a written request to the Chairperson of the ICC.
- b. The Chairperson of the ICC shall summon the complainant within a period of one week to confirm that the request was not made under any form of coercion or threat from any person. If the Chairperson concludes that an element of coercion was involved, they may, with the consent of the complainant, file a separate complaint regarding 'victimization' as defined in Regulation 2(g) of the UGC Regulations.
- c. If the Chairperson concludes that no coercion or threat was involved, conciliation proceedings shall be conducted by the Internal Complaints Committee or a sub-committee of the ICC.
- d. The conciliation process shall be completed in a period of 30 days from the time of the receipt of complaint. The complainant may choose to opt out of this process at any period of time during these thirty days and no adverse inference shall be drawn as a result of this.
- e. A conciliation settlement shall not include any monetary settlement or pecuniary benefit, but may include a verbal or written apology, counselling for the respondent, a bond of good conduct furnished by the respondent, monitoring of respondent's good conduct by the University, and/or any other relief agreed to by the complainant.

- f. If at any point in this process, the conciliator deems that the conciliation has been unsuccessful, they shall present a detailed report to the ICC giving reasons for the same within a week of the decision. If the process fails, the inquiry shall be resumed according to the provisions of the Regulations;

Provided that the time period spent in conciliation shall not be counted in the overall time limit for the proceedings.

- g. Notwithstanding anything contained in any other law, confidentiality shall be maintained by the conciliator and parties in relation to the proceedings and the settlement agreement. Confidentiality shall be maintained unless disclosure is necessary for implementation or enforcement of the settlement.

Part IV: General Provisions on Proceedings

26. Principles Governing Proceedings

- a. In all sittings of the ICC, a quorum of at least half (50%) of its members, necessarily including its Chairperson, shall be reached. In the absence of the Chairperson, the relevant rules for filling of casual vacancies shall apply.
- b. The ICC shall equitably follow the principles of natural justice at all times during its proceedings, and shall ensure that no victimisation or further victimisation of any party or witness occurs.
- c. If any ICC member is a witness in the impugned incident, or related to either party in a way that creates a personal interest in the outcome of the proceedings or reasonably increases the likelihood of either party exercising undue influence over them, they shall recuse themselves from the proceedings.
- d. All proceedings under these Regulations shall be conducted in-camera.
- e. No legal practitioner shall be permitted to represent either party in any proceedings before the ICC.
- f. The ICC may ask parties and witnesses to not bring mobile phones, or other devices that may be used for unauthorised recording, to any or all of the proceedings.

27. Confidentiality

- a. Notwithstanding anything contained in the Right to Information Act, 2005, the contents of the complaint made under Regulation 16, the identity and addresses of the aggrieved person(s), respondent(s) and witnesses, any information relating to conciliation and inquiry proceedings and the recommendations of the ICC shall not

be published, communicated or made known to the public, press and media in any manner by any person;

Provided that the final recommendation of the ICC and the action taken on its basis may be disseminated for purposes provided under these Regulations, but shall be disseminated without disclosing the name, address, identity or any other particulars which may lead to the identification of the complainant and the witnesses, except where necessary for the implementation of the recommendation;

Provided further that the final recommendation of the ICC and the action taken on its basis may be divulged by the University if mandated under any law for the time being in force.

Explanation: Information relating to proceedings shall include communications, documents and records made and/or maintained under these Regulations.

- b. In the event that any person violates the requirements of confidentiality under this Regulation, action may be taken by the University, on recommendation of the ICC or otherwise, against them as provided for under Regulation 23.
- c. The ICC and the University shall take all appropriate measures to maintain confidentiality of proceedings, including the identities of the parties.

28. Support Person

- a. The complainant may request the ICC to appoint a support person of their choice from the NLU Delhi community at any stage in the proceedings. The support person shall provide physical, mental, emotional and other support to the complainant through the proceedings.
- b. The ICC shall determine the precise role of the support person, including the extent to which they may attend or be involved in ICC proceedings, in consultation with the complainant.

29. Frivolous or Vexatious Complaints

- a. In case a complaint filed is found to be false and frivolous, lacking in seriousness or sound basis or mala fide at any stage of the proceedings, the ICC may recommend that such complainant be required to submit a written public apology which shall be prominently displayed across the NLU Delhi campus, and may also recommend appropriate action as provided under Regulation 23;

Provided that mere inability to substantiate allegations or provide sufficient proof in a complaint shall not by itself attract action under this Regulation.

- b. For the purpose of determination of *mala fide* nature of the complaint, the ICC shall be required to conduct sufficient inquiry before recommending any action under this Regulation.

30. Minor Infringement not to Invalidate Proceedings

No minor infringement of procedure shall invalidate any proceeding under this Regulation unless it is shown to have caused prejudice to any of the parties.

Part V: Miscellaneous

31. Responsibility of the RCC

- a. Every RCC shall, in its communications with any prospective recruiter, ask a prospective recruiter if they require to be informed if candidates shortlisted by the recruiter have been found guilty of sexual harassment.

Explanation: For the purpose of these Regulations, 'prospective recruiter' includes any entity whether in the form of a law firm, advocate's chambers, or any other office or organisation offering internships of any kind or placements to students through the RCC at any time.

- b. In case the prospective recruiter requires to be so informed, the RCC shall share the list of shortlisted candidates with the ICC and require the Committee to notify only the names of persons from the list who have been found guilty of sexual harassment, if any.
- c. Upon receiving such information, the RCC shall share the same with the potential recruiter but may not entertain any requests for further information in relation to the same.
- d. The RCC may not entertain any other considerations to mitigate against the requirement of sharing this information when so asked for by the recruiter.
- e. For the operationalisation of this Regulation, the ICC, the RCC and any other stakeholders may devise processes as may be necessary while taking considerations of confidentiality into consideration.

32. Maintenance of Records

- a. The records of inquiry proceedings under these Regulations shall be kept in the custody of the Registrar and records of all other proceedings shall be kept with the Policy Advisor except as required in this Part.

- b. The Facilitators shall maintain confidential records of all complaints or concerns that come before them; such records shall include:
 - i. the identity and profile of the complainant and the respondent,
 - ii. the nature of the concern,
 - iii. a brief account of the steps taken to address the concern, and
 - iv. the result of any process undertaken under these Regulations, except inquiry proceedings.
- c. The inquiry panel shall maintain confidential records of all proceedings that take place before it, which will include copies of all documents submitted at each proceeding.

33. Recusal

Any person conducting any proceedings under these Regulations shall recuse herself/himself if s/he feels that her/his objectivity may be compromised due to any reason or conflict of interest, and an *ad hoc* member of the same rank shall be appointed as a replacement within a period of ten working days.

34. Victimization

- a. ‘Victimization’ shall be understood to mean any adverse action by a person, group of persons or an organization, taken against an individual(s) who is a complainant, or witness for the complainant, or support person for the complainant, or has otherwise participated in any proceedings under these Regulations in good faith;

Provided that this definition shall not apply in the case of the respondent, their witnesses or support person.

Explanation: ‘adverse action’ shall include, but not be limited to

- i. making such participation a ground for adverse action relating to employment, academic participation or evaluation, extra or co- curricular activities or entitlement to services/opportunities,
 - ii. directly or indirectly using intimidation and/or undue influence so as to dissuade or deter such participation, and
 - iii. creation a hostile environment for the complainant and their witnesses.
- b. Any person or group of persons or organization found to be committing victimization at any time before the commencement of or during or after

proceedings under these Regulations, shall be liable to penalties under Regulation 23 as well as disciplinary action under other rules of the University.

- c. Without prejudice to sub-regulation (b) above, aggrieved persons and their witnesses shall have the right to seek interim relief during the pendency of any proceeding under these Regulations against any person/s, group/s or organization/s victimizing them.
- d. The ICC under these Regulations shall consider any proved complaint of victimization against a respondent in a proceeding to be a relevant factor in determining the penalty to be imposed under Regulation 23 of these Regulations for that proceeding and be treated as a major misconduct and subject to disciplinary proceedings by the university.

35. Protection of Transgender Persons

- a. Any transgender person, who has faced or is facing sexual harassment, may file a complaint for the same with the Complaint Officer appointed by the University under the Transgender Persons (Protection of Rights) Act, 2019.
- b. The Complaint Officer, upon receipt of a complaint, shall conduct an inquiry and submit a written report thereon to the Vice-Chancellor within 15 days of its receipt.
- c. The Vice-Chancellor, upon submission of a written report, shall take appropriate action thereon within 15 days of its submission.
- d. Submission of a complaint under this provision does not deprive the complainant of availing other remedies available to them under these Regulations or any other law.

36. Repeal and Saving

- a. The ICC Rules and PoSH Policy are hereby repealed and are to be replaced by these Regulations.
- b. Nothing contained in these Regulations shall prejudice any rights available to any employee or prevent any person from seeking any legal remedy under the PoSH Act, National Commission for Women Act, 1990, Protection of Human Rights Commission Act 1993 or under any other law for the time being in force.
- c. Where such conduct amounts to a specific offence under the Indian Penal Code or under any other law, the University may, if so requested by the complainant or aggrieved person, initiate appropriate action in accordance with law by making a complaint with the appropriate authority.

- d. The proceedings under these Regulations shall not, in any way, be affected by any other proceedings against the respondent preferred by the complainant under any other provision of civil or criminal law, except to the extent specifically ordered by a court of law.

37. Power to Remove Difficulties

The Vice-Chancellor, on the recommendation of the ICC or the ASH Policy Advisor or otherwise, is authorised to make any provisions necessary for removal of difficulties in the implementation of these Regulations.

38. Review of the Regulations

The University shall ensure that these Regulations is reviewed every three (3) years.

Annexure A: Format for Filing of Complaint under Regulation 16

The Chairperson,
Internal Complaints Committee,
National Law University Delhi

Respected ma'am/sir,

I/We, _____, request you to kindly take cognisance of an incident of sexual harassment as defined in the NLU Delhi Anti-Sexual Harassment Regulations, 2025 on the basis of this complaint.

1. Details of Complainant:

Name:

Designation:

Contact Details:

[In case this complaint is being filed by another person on behalf of the complainant, please provide the name, designation and contact details of such person as well as the circumstances why the aggrieved person is unable to initiate the complaint directly, and the relationship of such person with the complainant.]

2. Details of Respondent:

Name:

Designation:

Contact Details:

Relationship with Complainant, if any:

[Please include any relevant information with respect to power relations or other dynamics between the Complainant and the Respondent.]

3. Details of Employer of Complainant and/or Respondent, if applicable:

4. Details of Incident(s) of Sexual Harassment:

[Please include all relevant details such as date, time and location of the incident.]

5. Preferred Relief or Protection:

[Please refer to Regulation 23 for penalties that may be imposed under these Regulations.]

6. List of Witnesses, if any:

[Please provide a list of names and contact details of persons who would be willing to provide written and oral testimony as a witness on behalf of the complainant.]

7. Evidence in support, if any:

[Please provide a list of records/documents/other materials upon which you wish to rely in support of this complaint and annex the materials or copies thereof.]

8. Other information:

Has a representation of complaint been filed in relation to this incident before any other forum within the University? If yes, please provide details thereof.

Are you aware of any previous grievance or incident caused by the Respondent? If yes, please provide details thereof.

Has this complaint been filed within 3 months of the date of the alleged incident? If not, please provide reasons for delay.

Do you want to initiate conciliation proceedings instead of an inquiry at this stage?

[Please be informed that proceeding with an inquiry does not bar the complainant from requesting conciliation proceedings at a later stage in the proceedings.]

Is there any other relevant information you would like to share?

Sincerely,

(Name)

(Signature/Thumbprint)

Date:

Place: