



BOMBAY CHAMBER

Bombay Chamber  
of Commerce & Industry

*Code of Conduct :  
Safety of Women*





ॐ Preface ॐ

The condition of women in India has always been a matter of grave concern. Since the past several centuries, the women of India were never given equal status and opportunities as compared to that of their male counterparts. The patriarchal nature of Indian society, which even though gives respect to women as they are our mothers and sisters, has greatly hampered both the independence as well as the safety of women.

Although India has made strides into the 21<sup>st</sup> century there are still many circumstances in which a woman in India would not completely feel safe. The recent events have highlighted the lengths to go before Indian women can completely feel safe.

In view of the current scenario, the Managing Committee of Bombay Chamber has developed a Code of Conduct Guideline for the members of the Chamber with the help of Mahindra Special Service Group. We are sure that the Code of Conduct will be useful to the members for ensuring safety of their women employees.

Vikas Gadre  
Director General

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# Code of Conduct : Women's Safety

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## Overview

*“A woman is like a tea bag – you never know how strong she is until she gets in hot water.”*

– Eleanor Roosevelt

While the entire nation still reels under the shock of the heinous crime against a young girl on Dec. 16, 2012, one thing that every Indian will applaud is the timely submission of Justice J. S. Verma Committee Report. Justice Verma Committee took just 30 days to submit its recommendations for strengthening laws to curb sexual offences. Those who had been demanding capital punishment for the rapists are clearly disappointed as the committee ruled out death penalty but instead advocates increasing the sentence term.

The panel has widened the scope of sexual offenses including, but not limited to touch, advances, disrobing, stalking, voyeurism and has suggested various jail terms for such offenses. This indeed is a welcome suggestion as it will force the culprits to think twice before committing the so called “not so serious” crime.

Justice Verma Committee has also recommended some amendments to the “Protection of Woman against Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Bill, 2012”. This bill aims to protect women at workplace and is currently pending passage in Rajya Sabha. As always and more so, in the current scenario, business organizations are increasingly keen towards safety and security of employees, particularly women.

This code of conduct aims to highlight few measures to be adopted/ adhered to by women and employers in case of a gratuitous situation to safeguard themselves/ their women employees in providing a safe workplace and also to guide women on how to mitigate potential risky situations.

The Code outlines guidance for:

- Safety Measures by Employers
- Travel Security
- Cyber Crimes
- Public Transport Travelling
- Driving and Parking Safety Measures
- Domestic Violence
- Workplace Harassment
- Safety at Social Gatherings
- Actions by Complainants Committee (Do's and Don'ts) – Employers

### *Safety Measures by Employers*

The employers need to incorporate the measures for their employees safety, which should include:

- Development of robust and transparent policies against harassment at workplace.
- Initiation of whistle blower policy. To setup complaints committee for employees.
- Availability of a well-equipped emergency cell specific to women safety, monitored by a woman employee and dissemination of available functionary and related information.
- Safety sessions should be conducted on regular basis to increase the awareness level or could be imparted as a part of induction.
- Provide employees with cell-phone numbers of at least three senior members of the organization who should be contacted in case of an emergency.
- Ensure the employee helpline number is stored in cell-phones of employees on speed-dialmode.
- Initiate disciplinary action against perpetrators, initiate criminal action when required and provide support mechanisms to victims.
- Providing company transport to and from the workplace. (In case of odd hours)

- Ensuring that the women employee is not the first to be picked up and not the last to be dropped in the company transport.
- Outsourced vendors to provide their database of personnel to respective principal employers and they in turn to give that to the police.

## *Travel Security*

Women need to follow the measures (listed below) while travelling, irrespective of the mode of travel:

- Don't broadcast your plans. Also beware of any public announcement of your plans.
- Don't cancel regular deliveries. You should have your home functioning normally: daily deliveries, cleaning by maid. Request someone to keep an eye on your house.
- Leave an itinerary of your plans with your kin/ friends and how to reach you and your contact person in an emergency. This to be shared with police, if required.
- Make two photocopies of your passport identification page, airline tickets, driver's license, credit cards (and contact info), serial numbers of traveler's checks, medical prescriptions and your schedule. Leave one photocopy with your kin/ friends at home; pack the other in a place separate from where you carry the originals.
- If, during your trip, you make any changes in your travel plans, notify your kin/ friends back home.
- Put a piece of paper with your name and itinerary inside each bag to make identification easier if your baggage ID tag is lost.
- Upon arrival use hotel provided transportation whenever possible.
- Ask for directions from people in authority. Try not to travel alone at night.
- Pre-plan all travel & hotel arrangements at the destination before boarding.
- While en route, limit personal contacts and avoid discussing business.
- Cooperate with security. Report any suspicious activity to the security guards.

## *Cyber Crimes*

Cyber crimes are the hidden threats of the Internet, more and more women are falling prey to incidents. Few of these threats, which women fall prey to are: Harassment via e-mails, cyber-stalking, cyber pornography, defamation, morphing, e-mail spoofing.

The mitigatory measures to avoid falling prey to such crimes are as listed:

- When surfing the web, take precautions to avoid phony websites that ask for your personal information and pages that contain malware.
- Use a search engine to help you navigate to the correct web address since it will correct misspellings. That way, you won't wind up on a fake page at a commonly misspelled address.
- Regularly check all browser and email activity, it would be a good idea to use parental control software that limits the types of sites that children can gain access to.
- Use common sense whenever you're on the Internet. Never post personal information online or share sensitive information such as your account number or credit card number. Exercise caution when clicking on any links or downloading any programs.
- When checking your e-mail or chatting over instant messenger (IM), be careful not to click on any links in messages from people you don't know. The link could take you to a fake website that asks for your private information, such as user names and passwords, or it could download malware onto your computer. Even if the message is from someone you know, be cautious.
- Don't ever put too much personal details on Facebook, Google, LinkedIn, or other social networking site as it might get misused.
- Do not reveal your mother's name or your personal tastes, distastes, hobbies, which can be used to profile you and segregate you for targeted cyber crimes.

- Don't ever post your personal memories like snaps, where you are partying, or where you are on vacation. This helps to further profile you.
- Pick strong passwords (PW) and keep it secret. Change your PW often; when hacked - try and reset PW, visit help center and report.
- The Facebook default for Privacy Settings is "Everyone" - which exposes you to cyber-stalking and identity theft. To change that :
  - Click "Profile" on the blue bar at the top of the Facebook screen.
  - Click "Edit Profile"
  - At the bottom of the left column, click on "privacy setting"
  - Choose "customize setting" and lock down most, if not all, the options.
- If you plan to use Facebook on an insecure network, like a public Wi-Fi hotspot, first set the encryption option (https) to protect your personal account from being hacked. The "s" in https stands for "secure".
- Watch for anything that feels creepy or intimidating. Take it seriously and document everything to help police prosecute the stalker.
- If you know the stalker :
  - send him/her a clear written request to stop. Do this once only, then never again communicate with the stalker. Save copies in both electronic and hard-copy form.
  - If the stalking continues, complain to the stalker's Internet service provider (ISP), as well as your own ISP. Many ISP's have tools that block messages from specific individuals.
  - File a report with local police and save copies of their reports.
  - Collect all electronic and hard-copy evidence and document all contact made by the stalker.



## *Public Transport Travelling*

A few measures for ladies to adopt while travelling on public transport are as follows:

- Always choose an aisle seat in train & bus for quick exit.
- Remain alert. Try not to sleep/ Listen to music.
- Avoid prolonged eye contact with any stranger.
- Keep backup of emergency numbers in purse.
- Always look out for the presence of a cop when travelling in suburban trains.
- Be extremely watchful about the people who board the train. If you notice anyone suspicious, try and attract the attention of someone on the platform.
- Avoid footboard travel.
- If you are in a situation involving groping or other harassment, stand up for yourself.
- Make your objection to such behavior loud and clear.
- Use safety pins or hair clips as weapons against harassers.
- Carry a pen knife or pepper spray for self-defense. A torch is handy, if the lights go off.
- Make way towards ladies seats in crowded buses.
- Preferably travel in pair when travelling late at night in an auto/ taxi/ train.
- Avoid sharing a taxi/ auto with other unknown passengers.
- Do not display large amounts of cash when paying the driver.
- Sit in the rear of the taxi. Do not discuss personal details with the driver.
- If you feel uneasy with the driving or the route or the driver, instruct the driver to stop at the first secure or busy place.

## *Driving and Parking Safety Measures*

The list below brings out a few safety measures that women need to follow while driving or parking:

- If anyone is following you, don't go directly home. Go to a public place, stay locked in your car and blow the horn.
- Be alert to ploys such as cars that lightly bump you, bogus accidents or roadblocks. Drive on and notify the police when it is safe to stop.
- Avoid driving alone, especially at night.
- Be especially vigilant at vulnerable points, such as road junctions and traffic lights, parking.
- Keep valuables safe in the trunk or in place that cannot be seen from the vehicle exterior.
- Park in an area which is monitored by security personnel and illuminated at night.
- If secure parking is unavailable, park in an area that is well lit and that offers no hiding place for an attacker.
- Set the alarm system whenever the vehicle is parked.
- Park in areas that have higher traffic, avoid parking next to large trucks/vans or secluded places

## *Domestic Violence*

Domestic violence is a burning issue which has affected a number of Indian women on several occasions. Most of the Indian women don't come out in open and prefer to stay in an abusive relationship for many reasons. Listed are a few mitigatory measures for women to avoid domestic violence:

- The abuse will continue until you decide enough is enough.
- Confide in a trusted friend, relative, or doctor.
- Gather all your important legal documents, extra money, spare keys, and a packed bag with essential clothing and medications. Hide them with a friend or relative.

- Devise a code language with your children, family, and friends when you need to call police but might not be able to say it.
- Develop an escape plan for you and your children. Know where and how to go.
- During self defense disable the attacker enough so as to facilitate your escape. It's crucial that if you fight back and stun or defeat your attacker then you must immediately escape and seek the police in order to avoid his retaliation when he recovers. Make it clear to the police that you meant only to stop him from hurting you – in self-defense.

### *Workplace Violence*

Although majority of the Indian companies are coming out with stringent laws and whistle blower policies in regard to harassment at workplace; the incidents recorded of harassment at workplace are diminutive to the actuals. Listed are few mitigation measures to avoid incidents of harassment at workplace:

- Deal with the harasser upfront.
- Do the unexpected: Name the behaviour. Whatever he's just done, say it, and be specific.
- Hold the harasser accountable for his actions. Don't make excuses for him; don't pretend it didn't really happen. Take charge of the encounter and let people know what he did. Privacy protects harassers, but visibility undermines them.
- Make honest, direct statements. Speak the truth (no threats, no insults, no obscenities, no appeasing verbal fluff and padding). Be serious, straightforward, and blunt.
- Demand that the harassment stop.
- Make it clear that all women have the right to be free from sexual harassment. Objecting to harassment is a matter of principle.
- Stick to your own agenda. Don't respond to the harasser's excuses or diversionary tactics.

- The harasser's behaviour is the issue. Say what you have to say, and repeat it if he persists.
- Reinforce your statements with strong, self-respecting body language: eye contact, head up, shoulders back, a strong, serious stance. Don't smile. Timid, submissive body language will undermine your message.
- Respond at the appropriate level. Use a combined verbal and physical response to physical harassment.
- End the interaction on your own terms, with a strong closing statement: 'You heard me. Stop harassing women'.

### *Safety at Social Gatherings*

Listed are few mitigatory measures for women, to avoid any kind of harassment at social functions/ gatherings:

- Be alert and attentive to the surroundings
- Avoid getting intoxicated; if possible
- Do not accept drinks or food from strangers
- Never leave your drink unattended
- Alert other colleagues if someone is making you uncomfortable
- Do not reveal your personal information to any stranger
- Intimate your family / colleague / friend with whom you are and your expected time of return
- Share contact number of the person you are going out with, with your family or any concerned person

### *Actions by Complaints Committee (Do's and Don'ts) – Employers*

Employers need to set up redress mechanism/complaints committees as per Vishaka guidelines. First Contact Persons from within the Committee or otherwise should be appointed, who could try to resolve the complaint

informally first before the complaint goes to the formal channels of Complaints Committee. The organisation needs to put down clearly, certain non-negotiables for the Complaints Committee for effective resolution of complaints.

### *Complaints Committee:*

#### *Do's*

- Formalise and publicise complaint procedures that are easy and non-threatening.
- Provide safety for friends and supporters of the complainant.
- Appoint complaints officers-one man and one woman – to serve as the first point of contact.
- Complaint officers should be members of the committee. One of them should be an external expert.
- Authorise Complaint Officers to resolve the issue without the Committee's intervention. If the complainant is dissatisfied with the action, the complaint should go to the Committee.
- Use a cheerful, comfortable, airy room for meeting the complainant.
- Ensure that your body language communicates complete attention to the complainant and the accused.
- Treat the complainant with respect.
- Discard pre-determined notions of how a victim or accused should look or behave. Beware of stereotypes.
- All sexual crimes are committed in private, so that there may not be any eyewitnesses. This is an important point that the committee would do well to remember at all the times.
- Consult the complainant for punitive action.
- If the management does not accept the recommended action, it should give three valid reasons.
- Help the complainant regain his/her self-respect.
- Encourage the woman to note details of each incident of harassment and monitor any changes in work patterns or attitude on the part of

the alleged harasser so as to avoid, as far as possible, attempts at victimisation or accusations of poor work performance, etc.

- Make discreet enquiries as to whether other workers have experienced similar problems and if so, ask them details of any harassment, which has occurred.
- If the problem should involve transfer of one of the people involved, try to ensure that the harasser-rather than the victim- is the person required to move.
- Always document the results of any sexual harassment complaint or investigation. Not only document the results, but also document any corrective action that you asked the employee or supervisor to take. Follow up on any corrective action so you can document if the employee fails to take advantage of your companies policies/procedures or any corrective action that your company takes to prevent the sexual harassment from occurring again in the future.
- Inform all employees that it is their obligation to report sexual harassment that they either experience or witness.

### *Don'ts*

- Do not, under any circumstance, get aggressive.
- Do not insist on a detailed description of harassment. This could increase the complainant's trauma.
- Do not allow for interruptions when talking to the complainant and/or accused.
- Do not try and determine the impact of the harassment on the complainant. Let the complainant determine it. Help the complainant, if necessary.
- Do not discuss the complaint among the presence of the complainant or the accused.
- Remember, this is a human rights issue, therefore, (a) do not give too much weightage to intention, focus on the impact, and (b) 'proof beyond reasonable doubt' is not required, a strong probability is sufficient.



## Acknowledgement

The idea of developing Code of Conduct Guideline for the Safety of Women employees in the member organisation was floated by the Managing Committee of Bombay Chamber and decided to develop the Code of Conduct.

We sincerely thank Col. Deepankar Chaudhary (Retd.), Lead Consultant, Mahindra Special Service Group for writing the Code of Conduct. It has gone through series of reviews, discussions and revisions by the experts. Col. Deepankar has tried to incorporate all the relevant inputs; the Code of Conduct would not have been possible without his relentless efforts.

We would like to thank members of the Chamber who shared their policies for safety of women employees to develop the Code of Conduct.

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Bombay Chamber has an illustrious history of 177 years, and has, as its constituents, more than 4500 professionally-run companies from various sectors who together contribute a significant portion of India's trillion dollar economy. The Chamber acts as communication link between society, Government and Industry. The Chamber provides various opportunities through conferences, seminars, workshops, trainings, research and publication. The website of the Chamber gives the detail on services offered for the members.



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