



President  
Vipul K. Choksi

Hon. Jt. Secretaries  
Ketan L. Vajani | Haresh P. Kenia

Vice President  
Anish M. Thacker

Treasurer  
Parag S. Ved

Imm. Past President  
Hinesh R. Doshi

19<sup>th</sup> July, 2019

**Mr. Pravin Bhavsar**  
**Women & Child Development Department Mumbai City Collectorate,**  
**Government of Maharashtra,**  
Building 117, BDD Chawl, 1st Floor,  
Dr. Ambedkar Colony Compound, Dr. G. M. Bhosale Marg,  
Worli,  
Mumbai 400 018

**District Women and Child Development Officer in Mumbai ("DWCD") of the**  
**State of Maharashtra,**  
3rd Floor, New Administrative Building  
Madam Kama Road,  
Hutatma Rajguru Chowk,  
Mumbai - 400032,  
Maharashtra, India

**Sub: Mandatory Registration of Internal Compliant Committee constituted under POSH Act.**

Respected Sir,

The Chamber of Tax Consultants (CTC), Mumbai was established in 1926. CTC is one of the oldest voluntary non-profit making organizations in Mumbai – in its 93rd year - formed with the object of educating and updating its members on Tax and other Laws. It has robust membership strength of about 4000 professionals, comprising Advocates, Chartered Accountants and Tax Practitioners. The Chamber also has created a niche with the government and other regulatory agencies. It is the one of the leading institution for making effective representation with respect to Income Tax and Allied laws .It acts as catalyst for bring out necessary change both from the perspective of Government as well as Tax payers.



President  
Vipul K. Choksi

Hon. Jt. Secretaries  
Ketan L. Vajani | Haresh P. Kenia

Vice President  
Anish M. Thacker

Treasurer  
Parag S. Ved

Imm. Past President  
Hinesh R. Doshi

This is with reference to your order dated March 23, 2017 compelling all the employers of workplaces in the District of Mumbai City employing 10 or more employees to report details of constitution of their Internal Committee (IC) under Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 read with the Sexual Harassment of Women (Prevention, Prohibition and Redressal) Rules 2013 (Rules).

As per the Order, the details of the Internal Committee must be submitted in the Format (Prescribed Form A) by 20th July, 2019. Default for not submitting the Internal Committee details ***will amount to paying a fine of Rs. 50,000/- but and will also expose the company of having its license cancelled / discontinue its business.***

You shall agree that there are many employers for whom the said requirement shall be applicable. The awareness of the said order among the general public is not very prominent and has not been adequately publicized in media. The need to form the committee by an employer employing more than 10 employees should be made widely known to all the stakeholders, by using media and advertisement.

Further the penalty of Rs. 50000/- is extremely harsh for non-compliance by 20/07/2019. Keeping in mind the government's commitment to provide ease of doing business in India, such additional procedures without adequate publicity, and such heavy penalty would make doing business more and more onerous and cumbersome.

It is also pleaded that making this applicable to an organization with 10 or more employees is a very low threshold.

We therefore make the following requests:

1 – Kindly make the circular applicable in a phased manner with the first phase being applicable to an organization that engages more than 100 employees and this can be made applicable to others in a phased manner over time.



President  
Vipul K. Choksi

Hon. Jt. Secretaries  
Ketan L. Vajani | Haresh P. Kenia

Vice President  
Anish M. Thacker

Treasurer  
Parag S. Ved

Imm. Past President  
Hinesh R. Doshi

2 – The need to file Annexure A must be adequately publicized using available public media.

3 – The date for filing the same ought to be extended beyond July 20<sup>th</sup> 2019.

4 – The penalty for non-filing needs to be drastically reduced if not completely eliminated.

In view of the above we request to extend the date of submitting the details pertaining to Internal Committee.

Thanking you,

Sincerely yours,

For **THE CHAMBER OF TAX CONSULTANTS**

Sd/-

**VIPUL K. CHOKSI**  
**PRESIDENT**

Sd/-

**MAHENDRA SANGHVI**  
**CHAIRMAN**  
**LAW & REPRESENTATION COMMITTEE**

Sd/-

**APURVA SHAH**  
**CO-CHAIRMAN**