



Safe Workplaces or Symbolic Law? An Empirical Study of the Implementation of the POSH Act, 2013 in Tamil Nadu

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ABSTRACT :

The Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (the POSH Act) requires every employer with ten or more employees to constitute an Internal Committee (IC) and requires district authorities to constitute Local Committees (LC) for establishments that fall outside the IC requirement. More than a decade after enactment, compliance remains uneven and awareness among women workers is low. This paper examines how the Act is implemented in Tamil Nadu, covering the constitution and functioning of Internal Committees, the conduct of inquiries, annual reporting, and the role of District Officers. It is a documentary empirical study that triangulates three bodies of published evidence: official data placed before the Madras High Court in 2024 and 2025, national surveys, and Tamil Nadu RTI and sectoral studies, read with the judicial record. The State reported 56,951 Internal Committees by 2025, up from 19,475 a year earlier, yet the Court recorded only 305 complaints across those earlier committees, and a Labour Department survey found committees in 6,196 of 20,069 covered private establishments (30.9%). National surveys indicate that about a quarter of employees do not know whether their employer has a POSH policy and that roughly 70% of victims do not report, and a study of Tamil Nadu textile workers found that only 20% of interstate migrant women reported a committee at their workplace. The paper argues that formal compliance outpaces substantive compliance, identifies structural gaps in monitoring, training and trust, and proposes reforms to strengthen enforcement and accountability.

Keywords: sexual harassment at workplace; POSH Act 2013; Internal Committee; Local Committee; symbolic compliance; Tamil Nadu; unorganised sector

Introduction

Law can protect in two very different ways. It can change what happens inside workplaces, or it can change what workplaces are able to show an auditor. The POSH Act, 2013 sits exactly on this fault line. Its architecture is administrative: it asks employers to build a committee, display a notice, hold awareness programmes and file a report. Whether these steps translate into a woman feeling able to complain, and into a fair and timely inquiry when she does, is an empirical question that statutory text cannot answer.

The Act was born out of the Supreme Court's intervention in *Vishaka v. State of Rajasthan* (1997) 6 SCC 241, where the Court, facing legislative silence, laid down binding guidelines grounded in Articles 14, 15, 19(1)(g) and 21. Sixteen years later Parliament enacted the statute that gave those guidelines a legislative form. A further decade on, the Court itself has repeatedly expressed concern about non-implementation. In *Aureliano Fernandes v. State of Goa* (decided 12 May 2023), it recorded serious lapses in enforcement, noted a survey in which 16 of 30 national sports federations lacked a properly constituted committee, and directed the Union and every State and Union Territory to verify, within a fixed time, that committees exist and are composed as the Act requires. In later hearings the amicus curiae reported that some committees were headed by men, which the Act does not permit.

Tamil Nadu is a useful site for study. It has a long record of women's participation in the workforce, a large educational sector, a substantial IT and manufacturing base, and a very large informal workforce. It also has earlier legislation on the subject, the Tamil Nadu Prohibition of Harassment of Women Act, 1998, which addressed harassment in public places and educational settings but did not create the workplace redressal structure that the 2013 Act requires. Compliance in the State therefore offers a view of how a central statute performs in a regionally varied economy.

This paper is organised as follows. Section 2 sets out the legal framework. Section 3 reviews existing scholarship and identifies the gap. Section 4 describes the research design. Section 5 presents findings under the five research questions. Section 6 discusses the distinction between formal and symbolic compliance. Section 7 offers recommendations, and Section 8 concludes.

1.1. Research questions

1. To what extent have employers in Tamil Nadu constituted Internal Committees in accordance with Section 4?
2. How aware are women workers of the Act and of the complaint mechanism?
3. How do Internal Committees conduct inquiries, and are timelines and confidentiality maintained?

4. How effective are Local Committees in reaching women in the unorganised sector and small establishments?
5. Do the annual report and monitoring requirements work in practice?

1.2. Objectives and hypothesis

The study aims to assess compliance with the constitutional and procedural requirements of the Act, to identify barriers to reporting such as fear of retaliation, stigma and lack of trust in committees, and to suggest reforms for stronger monitoring and training. The working hypothesis is that formal compliance with the Act is higher than substantive compliance, and that awareness among women workers is lower than what is needed for effective redress.

The legal framework

1.3. From Vishaka to statute

The *Vishaka* guidelines defined sexual harassment, imposed a duty on employers to prevent it, required a complaints committee headed by a woman with an external member from a non-governmental organisation, and mandated awareness. In *Apparel Export Promotion Council v. A.K. Chopra* (1999) 1 SCC 759, the Court read the guidelines into disciplinary law and stressed that the test of harassment looks to the effect on the woman, not merely to the intention of the accused. In *Medha Kotwal Lele v. Union of India* (2013) 1 SCC 297, the Court monitored compliance and directed that the committees under the guidelines be treated as inquiry authorities for disciplinary purposes. The 2013 Act and the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Rules, 2013 followed in the same year.

1.4. Scope

The Act protects women from sexual harassment at any workplace, defined broadly in Section 2(o) to include government bodies, private institutions, hospitals, educational institutions, sports venues, places visited in the course of employment, and, importantly, a dwelling place or house. The definition of employee covers regular, temporary, ad hoc and daily-wage workers, contract workers, volunteers, apprentices and trainees, whether or not the principal employer knows of their engagement. Section 3 prohibits sexual harassment and lists circumstances such as implied or express promise of preferential treatment, threat of detrimental treatment, and humiliating treatment likely to affect health or safety, which, if connected with an act of harassment, may amount to harassment under the Act.

1.5. Internal Committees

Section 4 requires every employer of a workplace with ten or more employees to constitute an Internal Committee at each administrative unit or office. The Presiding Officer must be a woman employed at a senior level. The committee must include at least two members from among employees who are committed to the cause of women or who have experience in social work or legal knowledge, and one external member from a non-governmental organisation or association committed to the cause of women, or a person familiar with issues relating to sexual harassment. At least half of the members must be women. Members hold office for a period not exceeding three years.

1.6. Local Committees and the role of the District Officer

Section 5 empowers the appropriate government to notify a District Officer, and Section 6 requires that officer to constitute a Local Committee in each district, with nodal officers at the block, taluka, tehsil, ward or municipality level. The Local Committee receives complaints from women employed in establishments with fewer than ten employees, where the Internal Committee has not been constituted for that reason, and complaints against the employer himself. It is the principal route for women in the unorganised sector and in domestic work. In Tamil Nadu, the Social Welfare and Women Empowerment Department appointed District Collectors as District Officers by an order of 11 November 2016.

1.7. Complaint and inquiry

Under Section 9, a complaint must be made in writing within three months of the incident, extendable by a further three months for reasons recorded. The committee must offer conciliation if requested by the complainant under Section 10, but monetary settlement may not be the basis of conciliation. Where an inquiry is held under Section 11, it follows the service rules applicable to the respondent, or the prescribed procedure where none exist, and must be completed within ninety days. The report must be furnished within ten days of completion under Section 13, and the employer must act within sixty days. Section 12 allows interim relief, including transfer or leave for the complainant, during the pendency of the inquiry.

1.8. Confidentiality, duties and accountability

Section 16 prohibits publication of the identity of the complainant, respondent, witnesses and inquiry details, with penalty under Section 17. Section 19 requires employers to display penal consequences and the order constituting the committee, conduct regular workshops and awareness programmes, provide facilities for the inquiry, and monitor the timely submission of reports. Section 21 requires the committee to prepare an annual report, and

Section 22 requires employers to include the number of cases in their annual reports or, where no such report is required, to inform the District Officer. Section 26 provides for a fine of up to fifty thousand rupees for non-compliance, with enhanced punishment for repeat offences and the possibility of cancellation of licence or registration.

The design is therefore reasonable on paper. Its strength is that it places affirmative duties on employers. Its weakness is that enforcement depends on administrative monitoring that the statute describes only in general terms and that depends heavily on the capacity and will of District Officers.

Literature and the research gap

Existing scholarship on the POSH Act falls broadly into three groups. The first is doctrinal, analysing definitions, the interaction between the Act and service law, and the scope of the Section 2(o) definition of workplace. The second consists of reports by civil society organisations and government bodies, which typically document non-compliance through RTI responses or sample audits, often at the national level. Such reports have repeatedly found that a significant proportion of establishments and public bodies had not constituted committees or filed annual reports. The third strand is feminist critique, which argues that the Act's compliance model individualises a structural problem, places the burden of initiating action on the woman, and relies on committees whose members are dependent on the employer.

What remains thin is State-level, sector-comparative empirical work that links three layers: the formal constitution of committees, the experience of women who might use them, and the administrative record held by District Officers. This study attempts to link those three layers within a single State.

Research design

1.9. Approach

The study is non-doctrinal and empirical, with a doctrinal background that covers the Act, the Rules, *Vishaka* and subsequent judicial decisions. A non-doctrinal approach was chosen because the research questions concern the operation of law in practice, which cannot be answered from statutory text or reported cases alone. The study does not report original fieldwork. It is a documentary empirical study that triangulates published evidence. This allows State-wide coverage that a small primary survey could not offer, at the cost of control over questions, samples and definitions.

1.10. Data sources

Three layers of evidence are used. The first is official data. It comprises the State's reports placed before the Madurai Bench of the Madras High Court in *Dr. Supraja v. State* (W.P.(MD) No. 13981 of 2024 and connected petitions; orders of 21 November 2024 and 19 November 2025), which cover committees constituted, a Labour Commissionerate survey of 1,84,072 private establishments as on 31 August 2025, a Directorate of Collegiate Education report of 5 August 2025 and the designation of nodal officers, together with replies of the Ministry of Women and Child Development in the Lok Sabha on complaints to the National Commission for Women, She-Box and the National Crime Records Bureau.

The second layer is published survey evidence: a FICCI-EY survey of organisations conducted in 2015, a survey of 6,047 respondents by the Indian National Bar Association (INBA) reported in 2017, and a 2026 report by the compliance firm POSH at Work (The Legal Swan) drawing on 6,353 survey responses and 103 complaints handled in 2025. The third layer is Tamil Nadu evidence: RTI-based findings from Chennai (Centre for Law and Policy Research, 2020) and from the textile belt (reported by the Thomson Reuters Foundation, 2017), a study of migrant women textile workers by the non-governmental organisation READ as reported by UN Women (2024), and press accounts of a Dindigul mill case (2016).

1.11. Analytical approach

Official figures are converted into compliance ratios (committees constituted as a share of establishments covered, and complaints per committee) and compared across sectors. National and sectoral survey results are treated as indicative benchmarks, not as Tamil Nadu estimates, and each finding in Section 5 states its geographic scope.

1.12. Limitations

The official data are reported by State departments themselves, use different reference dates and categories, and count committees constituted rather than their composition or functioning. The 2024 complaint figure and the 2025 committee figures come from different reports and are not a strict time series. The national surveys are non-probability, online or consultancy-led, cover different years (2015 to 2026), and are not representative of Tamil Nadu. Some findings reach this paper through press or agency reports and not through the original documents. Complaint counts depend on reporting and on category definitions, and the Union Ministry has told Parliament that no centralised data on workplace harassment cases is maintained. District-level primary fieldwork would be needed to test the indicative figures used here.

Findings and analysis

1.13. Constitution of Internal Committees (RQ 1)

The State told the High Court that 56,951 Internal Committees had been formed by 2025: 22,044 in government establishments and 34,907 in private ones. The Court's earlier order had recorded 19,475 committees as of June 2024, so the reported count roughly tripled in about a year. That pattern suggests that judicial pressure, more than the statute alone, drove constitution. Details of 41,103 committees (72.2%) had been uploaded to the TN POSH Portal, with the rest pending.

The sector picture is uneven (Table 1). Every government college (180 of 180) and aided college (161 of 161) with ten or more employees had a committee, against 590 of 654 private colleges (90.2%), or 931 of 995 overall (93.6%). Private commerce looks weaker. The Labour Commissionerate surveyed 1,84,072 establishments in five categories (shops, catering, motor transport, beedi and cigar, and plantations) and found 20,069 with more than ten employees. Committees existed in 6,196 of them (30.9%), and the other 13,873 (69.1%) were reported to be 'in the process' of constituting one after the Court's direction. The remaining 1,64,003 surveyed establishments (89.1%) fall below the threshold, so the Internal Committee duty never reaches them.

Table 1 - Reported Internal Committee compliance by sector, Tamil Nadu (shares calculated from figures in the Madras High Court order of 19 November 2025).

Category (establishments with ten or more employees)	Covered	With committee	Share (%)
Government colleges	180	180	100.0
Aided colleges	161	161	100.0
Private colleges	654	590	90.2
All colleges	995	931	93.6
Private establishments (Labour survey, five categories)	20,069	6,196	30.9

Earlier and sectoral evidence points the same way. A FICCI-EY survey of organisations in early 2015 found that 36% of Indian companies and 25% of multinationals were not compliant with the Act, which requires committees to be constituted (national, online survey). In the Tamil Nadu textile belt, an RTI query by a local charity drew the State's reply that it had no record of committees being formed or functioning in more than 3,000 mills across four districts (Thomson Reuters Foundation, 2017). Workers' own reports agree. In the READ study of migrant women textile workers, reported by UN Women in 2024, only 20% of interstate and 50% of intrastate workers said their workplace had an Internal Committee. An earlier press report citing the Social Welfare Department put the committees known to the State at 1,317, a figure since overtaken by the 56,951 reported to the High Court. Some of the recent growth may therefore reflect registration and reporting more than new institutions.

These counts show that a committee exists, not that it meets Section 4. They say nothing about external members, a woman Presiding Officer or tenure. In one of the petitions, the Court found that the committee had no external member, and it asked the State to keep a register of external members so that one person does not sit on hundreds of committees.

1.14. Awareness among women workers and reporting (RQ 2)

The official reports reviewed here contain no measure of awareness among women workers in Tamil Nadu, so national surveys serve as benchmarks (Table 2). The POSH at Work survey (6,353 responses, reported in August 2026) found that 24.86% of employees did not know whether their organisation had a POSH policy, and 38.45% did not treat abusive or vulgar language as sexual harassment. The INBA survey (2017; 6,047 respondents, 78% of them women) found that 38% of women reported having faced harassment, that about 70% of victims did not report it, and that 65.2% of victim respondents said their company did not follow the process the Act prescribes.

Table 2 - Published survey evidence on compliance, awareness and reporting (indicative benchmarks, not Tamil Nadu estimates unless stated).

Source and year	Coverage	Reported finding
FICCI-EY (2015)	Online survey of organisations, India, January to April 2015	36% of Indian companies and 25% of multinationals not compliant with the Act
INBA (2017)	6,047 respondents, 78% women, India	About 70% of victims did not report; 65.2% of victim respondents said the employer did not follow the Act's process
READ, via UN Women (2024)	Migrant women textile workers, Tamil Nadu	Nearly 50% faced harassment or abuse; 20% (interstate) and 50% (intrastate) reported a committee at the workplace
POSH at Work, via Supreme Today (2026)	6,353 survey responses and 103 complaints (2025), India	24.86% unaware of a policy; 38.45% did not see vulgar language as harassment

Tamil Nadu's own use data show the same pattern from the other end (Table 3). As of June 2024 the Court recorded only 305 complaints across 19,475 committees, about 1.6 per hundred, and asked whether this reflected an absence of incidents or fear of backlash and discouragement. By

February 2019, SHe-Box had received 22 complaints from Tamil Nadu out of 423 nationally (5.2%), and the National Commission for Women registered 38, 17 and 34 complaints from the State in 2016, 2017 and 2018 under the category that includes workplace harassment. The National Crime Records Bureau recorded 2, 0 and 0 cases of insult to modesty at office premises from the State in 2014 to 2016, against 57, 119 and 142 nationally.

Table 3 - Workplace sexual harassment complaints from Tamil Nadu by channel.

Channel	Period	Tamil Nadu	National comparator
NCW complaints (category including workplace harassment)	2016; 2017; 2018	38; 17; 34	Not reported here
NCRB cases, insult to modesty at office premises	2014; 2015; 2016	2; 0; 0	57; 119; 142
SHe-Box complaints since 2017	To February 2019	22	423 (Tamil Nadu 5.2%)
Complaints to Internal Committees (Madras High Court)	To June 2024	305 across 19,475 committees	Not applicable

These numbers are small for a State that employs 43% of India's 1.6 million women factory workers, although the comparison is rough, since factory workers are only part of the workforce these counts cover. The READ study found that nearly half of migrant women textile workers had experienced harassment or abuse from supervisors or male workers. Set against the complaint counts, the gap between experience and complaint is wide, which is consistent with the first limb of the hypothesis.

1.15. Conduct of inquiries (RQ 3)

The State's 2025 report, as recorded in the Court's order, gives committee counts but no figures on inquiries completed within ninety days, interim relief under Section 12 or confidentiality breaches, even though the Court had asked for a dashboard showing complaints received and resolved. The State has since issued a Standard Operating Procedure on receipt of complaints, inquiry and statutory filings, which sets the procedure but does not show whether it is followed.

Other evidence is indirect. The POSH at Work analysis of 103 complaints handled in 2025 found that the respondent was held guilty in 48.04% of cases and the complaint was found false or malicious in 5.88%, a small share that cuts against claims of widespread misuse. Some 90.2% of those complaints involved a hostile work environment and not quid pro quo harassment. The same survey found that 54.27% of employees and 41.14% of managers would discuss an ongoing complaint with colleagues, and that 53.95% of managers thought a respondent should be dismissed at once if direct evidence existed. Both views conflict with the Act's confidentiality and due-process requirements. These are national, consultancy-collected figures, but they indicate the practical misunderstanding that Tamil Nadu committees, many constituted only after the 2024 and 2025 directions, are likely to meet.

A 2016 case from a Dindigul spinning mill shows the difficulty from the complainants' side. Six women wrote an anonymous letter describing harassment by a supervisor. The official inquiry reached a dead end because the complainants could not be identified and workers denied harassment, and a union leader said that women normally speak only after leaving their jobs.

1.16. Local Committees and the unorganised sector (RQ 4)

District Officers reported designating 2,981 nodal officers: 1,605 at ward level (53.8%), 391 in town panchayats, 382 at block level, 299 at taluk level, 144 in municipalities, 94 at revenue division level and 66 in corporation zones. The designation is real, but the reported figures stop at appointment, and the 2025 order records no data on complaints received by Local Committees. The one district-level audit available is older. A 2020 RTI reply showed that the Chennai Collectorate's Local Committee had received a single complaint between 2014 and 2019, that only the Collectorate itself had constituted an Internal Committee, and that the Mambalam taluk office had none. An earlier press report citing the Social Welfare Department said that the State had counted 83 cases of workplace sexual harassment across Local and Internal Committees since 2015, and that it was urging companies to constitute committees at intervals of about four months.

The textile evidence shows why this matters. The 2017 RTI finding concerned mills, which employ large numbers of women and fall in the Internal Committee category, yet the State could not say whether committees existed. Small units, below the ten-employee threshold, depend wholly on the Local Committee, and the data reviewed here show no sign that it reaches them.

1.17. Annual reports and monitoring (RQ 5)

The monitoring architecture has grown quickly on paper. G.O.Ms. No. 65 of 18 June 2025 authorises designated officers to inspect workplaces with a prescribed checklist and report within seven days. Proposals under the TN We-SAFE project include Gender Audit Squads in 39 districts, an upgraded committee portal and an expanded Industry Coalition project, and the State Commission for Women has been given a supervisory role. The State has also said that its power to frame rules under the Act is limited, so it acted through the Standard Operating Procedure instead. Against this, the material reviewed records no filing rate for annual reports under Section 21 and no action under Section 26. The Court observed that the State prefers persuasion to coercion, and said coercive steps should follow if persuasion does not deliver within a time limit.

The national picture explains part of the gap. The Union Ministry told the Lok Sabha in July 2019 that annual reports travel from committees to employers and District Officers and then to State governments, and that, as a result, no centralised data on workplace harassment cases is maintained. A

reporting chain with no central point of aggregation makes it hard to say whether Section 21 and Section 22 are working, and it leaves non-compliance invisible to the authorities who are meant to act on it.

Discussion: formal compliance and symbolic compliance

The evidence supports both limbs of the central hypothesis, with the caveat that awareness is measured through national and sectoral proxies. Formal compliance is near complete where institutions are public or tightly regulated (all 341 government and aided colleges), lower in private colleges (90.2%) and low or unverified in private commerce (30.9% of covered establishments), while use is almost nil (305 complaints across 19,475 committees). On awareness, national surveys suggest that about a quarter of employees do not know whether their employer has a policy and that about seven in ten victims do not report, and the one Tamil Nadu sectoral study available points to weaker protection among migrant textile workers. Formal compliance means that the visible artefacts of the Act exist: an order constituting the committee, a notice on the wall, a report in a file. Substantive compliance means that a woman who experiences harassment knows where to go, believes she will be heard, and is not punished for speaking. Symbolic compliance is the space between the two, where law is performed rather than practised.

Three structural explanations deserve emphasis.

First, **the dependency problem**. An Internal Committee is constituted by the employer, its members are employees, and the respondent is often senior to them. The statute attempts to solve this through the external member and the requirement that the Presiding Officer be senior, but where the external member is nominal and where seniority sits within the same hierarchy, independence is weak. Fear of retaliation is therefore not irrational; it is a reasonable reading of the committee's design.

Second, **the monitoring problem**. Section 23 empowers the appropriate government to monitor implementation and Section 25 allows it to call for information, but neither creates a routine auditing mechanism. District Officers carry the Act's duties on top of other responsibilities, often without dedicated staff, training or budgets. Where the state does not count, penalties under Section 26 are unlikely to be imposed, and employers rationally treat non-compliance as low risk. The 2025 High Court order shows the pattern: the State reported a portal, inspection orders and proposed audit squads, but no coercive step, and the Court noted that persuasion is acceptable only if it produces results.

Third, **the reach problem**. The Local Committee model assumes that a woman in a small shop, a home or a field knows that a district-level body exists, can travel to it and can complain against the person who controls her livelihood. For the majority of women in the unorganised sector, none of these assumptions may hold. The Act's formal coverage of the informal economy is broad, but its machinery for reaching it is thin.

These explanations also qualify the feminist critique in a useful way. The Act is not merely individualising; it is also under-enforced, so that the first burden on the woman is to find a mechanism that may not exist. Reform should therefore address enforcement capacity as much as doctrine.

Recommendations

1. **Mandatory registration and public listing.** Complete the uploads still pending on the TN POSH Portal and require annual renewal, with verification of each committee's composition and not only its existence. A public list would let women and officials verify that a committee exists, and would make non-compliance visible.
2. **Routine audits by District Officers.** Operationalise the June 2025 inspection order and the proposed Gender Audit Squads through a sampling-based annual audit in each district, prioritise sectors where non-compliance is highest, and publish district-level compliance and complaint figures.
3. **Strengthening the external member.** Maintain a State-level empanelled list of trained external members, rotate them across establishments, and require recorded attendance at inquiries, so that the role cannot remain nominal.
4. **Training for committees and officers.** Provide standard, periodic training on inquiry procedure, confidentiality, interim relief and the limits of conciliation, delivered in Tamil as well as English. The survey evidence on confidentiality and due process makes this a priority for managers as well as committee members.
5. **Dedicated outreach to the unorganised sector.** Appoint and publicise nodal officers at the block and ward level, partner with women's collectives, self-help groups and trade unions, and provide complaint channels that do not require travel to the district headquarters.
6. **Protection against retaliation.** Make explicit that retaliation against a complainant or witness is a distinct violation with its own consequence, and require employers to record and review post-complaint outcomes for the complainant.
7. **Consistent annual reporting.** Standardise the format of annual reports, link filing to existing statutory returns, and require District Officers to aggregate and publish figures, including the number of Section 26 actions, so that the absence of centralised data acknowledged by the Union Ministry in 2019 is remedied at least within the State.
8. **Awareness in accessible form.** Display notices in the local language, use visual material, and include the Act in induction and in the curriculum of vocational and higher education.
9. **Measuring awareness and trust.** Commission an independent State-wide survey of women workers every three years, using probability sampling across sectors and districts, so that awareness and trust are measured and not inferred from national proxies.

Conclusion

The POSH Act, 2013 promises every woman a workplace free from sexual harassment and a credible route to redress when that promise fails. This study set out to test whether, in Tamil Nadu, the promise is kept or merely recited. On the published record, the Act's visible structures, now numbering 56,951 reported committees, far outrun their use, and national and sectoral surveys suggest that many women neither know of these structures nor trust

them. The gap is likely widest for the women with the least bargaining power: contract workers, small-establishment employees and women in the informal economy.

The lesson is not that the statute is misconceived. Its duties are sensible and its architecture is defensible. The lesson is that a law whose enforcement depends on employers policing themselves will produce the paperwork of compliance faster than the reality of safety, unless the State builds the capacity to look, count and sanction. Until awareness, independence of committees and administrative monitoring improve together, the Act risks remaining, for many women, a law that exists for the file rather than for the workplace.

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