

GUIDELINES for HR Managers, Supervisors, Team leaders and Managers at Senior Positions

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1. INTRODUCTION

Let's first understand Why Bother?

Violence and harassment in the workplace are a serious violation of human rights and a major barrier to achieve equality of opportunity and access to decent and dignified work: in the great majority of the incidents, employees are afraid to denounce sexual harassment as they might lose their job, be penalised or even blamed. Sexual harassment has a devastating impact on workers' health, wellbeing and performance at work.

This type of violence is deeply rooted in social norms, values and stereotypes that foster gender inequalities, discrimination against women and unequal power relations between men and women, including intersecting forms of discrimination, for example, based on gender and race, disability or social origin¹.

Although all researches show that women are more likely to become victims of sexual harassment in the workplace (SH), this also applies to men and LGBTQI, whose cases are being systematically underreported.

Sexual harassment exists in every society and encompasses all jobs, occupations and sectors of the economy. It takes different forms and can come from a co-worker, a supervisor, a customer or a client. Policy documents and research by a number of international organisations and academic literature show that gender-based violence and harassment are pervasive and despite their scope and social impact remain largely under-reported overlooked and relatively under researched. According to the European Union information agency for occupational safety and health (EU-OSHA), only 4% of the victims (men and women) report sexual harassment to an employer or manager. Same source reveals that women are almost three times as likely to be sexually harassed².

Identifying the methods to recognise, prevent and address the phenomenon requires combined efforts, shared responsibility and common policies and practices.

The main goal of TEAMWORK project is to strengthen the fight against sexual harassment at workplace (SH) in four EU Member States (Greece, Italy, Spain and Bulgaria), where a number of laws and regulations have been ratified in order to prohibit sexual harassment in the

¹ UN Women ILO (2019) HANDBOOK Addressing violence and harassment against women in the world of work, p. 2-3 https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-ankara/documents/publication/wcms_731370.pdf

² Similar findings were presented by a report launched on March 2019 by OSCE, which complements the 2014 European Union Agency for Fundamental Rights (FRA) "Violence against women: an EU-wide survey". According to the OSCE report, sexual harassment in the workplace was seen by many women as a common occurrence. The women interviewed said that workplace sexual harassment was particularly likely to be perpetrated by men in senior positions.

workplace. Despite the reinforcement of the legislative arsenal in all countries, there are still gaps between what the laws state and what applies in reality.

The TEAMWORK team worked in two level analysis regarding the problem of SH the partners' countries:

- Desk research on existing international and national legislation and literature on the issue of SH; quantitative³ and qualitative⁴ research
- Comparative report which summarized data gathered by the above-mentioned research held in Bulgaria, Greece, Italy and Spain.

Developing Guidelines for Employers

The following Guidelines were developed by the TEAMWORK project's partners to support the work of employers, HR professionals, supervisors, team leaders and managers in senior positions in preventing and combating sexual harassment in the workplace (SH).

The **research** conducted in the framework of the TEAMWORK project with 499 participants, showed deficiencies and gaps in terms of employees' and employers' knowledge and experience on how to address SH. It was also evident that the gaps were more extensive on the employers' side. However, an important conclusion of the research was the willingness of the majority of the participants to be empowered in order to better address the issue.

The **methodology** applied in the development of the guidelines included taking into consideration the results of the abovementioned research, as well as a series of studies and analysis and evaluation from the project's expert partner Adecco and other relevant stakeholders.

The following guidelines aim to provide employers, Human Resources professionals and managers with:

- Summarized information on SH in the workplace: definitions of SH; national, international and EU's legislation,
- Recommendations to revise their policies to prevent, identify and tackle SH cases such as: prevention measures; ways/ practices to create a culture of zero tolerance towards SH; policies to protect victims and whistleblowers; empowerment of victims of all

³ The purpose of the empirical survey was to reveal the current state of play and collect data that would shed light on the issue and highlight gaps that need to be filled, patterns of SH, behaviour of victims and managers as well as companies' prevention and protection policies. 384 employees and 115 employers (management staff, Human Resources) answered the online TEAMWORK survey between June and September 2020 (in English or in national language).

⁴ The qualitative survey was based on in-depth interviews with main stakeholders in the project countries, like representatives of: Ministries / Governmental Bodies; Specialised bodies (Anti-discrimination Commissions, Equality bodies); Employer' Organisations; Trade Unions / Employee Organisations.

genders (including men, LGBT+) to speak out and report an incident; instructions on how to establish safe paths for grievances and reporting (for staff of all levels) and on how to ensure that the complaint investigation process is completely transparent and procedurally fair, etc.

- Examples of best practices.
- Annexes including samples of documents for prevention and reporting of SH, that can be used by company's/organizations' management.

2. DEFINITIONS

The term “sexual harassment”, especially within the workplace, is a relatively new concept across the European Union. Along the years, the European Union has introduced important legislation and guidelines to support safe and decent working conditions and equal treatment that directly address or are relevant to sexual harassment in the workplace.

There is no commonly agreed definition of sexual harassment in the workplace (SH). The international and European framework is translated in few common elements of the SH definition in the countries under review. The behaviours that are defined as SH are characterized as follows:

- a) Occur in the place of work or in a work related environment;
- b) It is acknowledged as a form of gender-based violence, as it is deeply rooted in gender inequality. Sexual harassment involving conduct of a sexual nature is the subject of all reviewed laws;
- c) Represent any unwelcome, unwanted conduct of a sexual nature in relation to the person harassed;
- d) Affect the terms or conditions of employment (quid pro quo sexual harassment) or the work environment itself (hostile work environment sexual harassment), and thus contributes to gender inequality in the labour market.

The EU definitions of harassment and sexual harassment are fully recognized in the legislation of Bulgaria, Greece, Italy and Spain. The relevant legislation essentially uses the same wording as the EU Directives.

3. LEGISLATION

The national legal framework on sexual harassment in the workplace of the TEAMWORK project's countries (Bulgaria, Italy, Greece and Spain) must be understood in the context of their broader international obligations to prevent sexual harassment and other forms of gender-based violence and discrimination.

International Conventions: United Nations (UN) and International Labour Organisation (ILO)	
The UN Convention on the Elimination of all Forms of Discrimination against Women (CEDAW) adopted in 1979 by the United Nations General Assembly.	Ratified by all project countries. According to <i>General Recommendation 19</i> ⁵ to the Convention, <i>gender-based violence is a form of discrimination that seriously inhibits women's ability to enjoy rights and freedoms on a basis of equality with men.</i> ⁶ General recommendation No. 19 was further updated in General Recommendation N° 35 (2017) which clearly shows that violence is not a private matter but a human rights violation ⁷ .
The UN Declaration on the Elimination of Violence against Women, adopted by the General Assembly in 1993 and the 1995 Beijing Declaration and Platform for Action	The Declaration cover all forms of discrimination and violence against women and girls and reaffirm the responsibility of governments to work to eliminate them.
The Resolution of the UN General Assembly adopted in 2018 specifically focused on sexual harassment ⁸	The Resolution urges States to step up their activities and take measures and policies to prevent and eliminate sexual harassment in the context of ending violence against women and girls.
The Violence and Harassment Convention (Convention 190) of the International Labour Organisation (ILO) ⁹ and the	Convention 190 is the first international convention against violence and harassment at work ¹¹ . It recognises that sexual harassment and harassment at work are forms of gender-based violence, disproportionately affecting women. Considering the changing world of work, the Convention encourages

⁵ General recommendation No. 19: Violence against women. Retrieved 29/09/2020 from : <https://www.globalhealthrights.org/wp-content/uploads/2013/09/CEDAW-General-Recommendation-No.-19-Violence-against-Women.pdf>

⁶ The General Recommendation 19 defines sexual harassment to include "such unwelcome sexually determined behaviour as physical contact and advances, sexually coloured remarks, showing pornography and sexual demands, whether by words or actions. Such conduct can be humiliating and may constitute a health and safety problem; it is discriminatory when the woman has reasonable ground to believe that her objection would disadvantage her in connection with her employment, including recruitment or promotion, or when it creates a hostile working environment."

⁷ Recommendation N° 35 (CEDAW/C/GC/35) <https://www.ohchr.org/EN/HRBodies/CEDAW/Pages/GR35.aspx>

⁸ UN Intensification of Efforts to Prevent and Eliminate All Forms of Violence Against Women and Girls: Sexual Harassment, GA/Res 73/148, UN Doc A/RES/73/148 (17 December 2018). <https://digitallibrary.un.org/record/1660337?ln=en>

⁹ ILO Violence and Harassment Convention No. 190, 2019. Retrieved 29/9/2020 from https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

¹¹ It builds on the ILO Convention on Discrimination in Employment and Occupation, 111/1958

<p>Recommendation 206 on violence and harassment¹⁰ voted in June 2019 in Geneva</p>	<p>States to adopt a broad definition of ‘worker’ and ‘workplace’ in order to cover the full range of traditional and non-traditional work arrangements and different workplace settings in which violence and harassment can be experienced and updates the protection in accordance to the present working circumstances (articles 2 and 3 of the Convention). This Convention is not yet ratified by all project countries</p>
<p>European Conventions</p>	
<p>The Convention of the Council of Europe for the Prevention and Combating Violence Against Women and Domestic Violence (Istanbul Convention) which was adopted in 2011</p>	<p>This Convention is the first legal document that precisely defines and criminalizes various forms of violence, including psychological violence and stalking, and sexual harassment. The Istanbul Convention is of particular importance as it makes it clear from the preamble that violence against women is a manifestation of historically unequal power relationships between sexes, and it aspires to create a Europe free from such form of violence. The Convention defines violence against women as a human right violation and aims to eliminate all form of violence against women [Art. 3 point (a) of the Istanbul Convention]¹². Sexual harassment is among the behaviours prohibited by the Convention and the states must take responsibility for undertaking all necessary legislative or other measures so that sexual harassment is prohibited (Article 40). Furthermore, it provides possibilities for the implementation of a wide range of policies related to prevention, protection and support to victims, and prosecution and punishment of perpetrators. At an institutional level, campaigns can be used to mobilize the public and the private sector in prevention, for example, by targeting employers’ associations or trade unions. The Istanbul convention was ratified by the Greek government¹³, Italian and Spanish governments. As yet the Bulgarian government just signed, but did not</p>

¹⁰ R206 - Violence and Harassment Recommendation, 2019

https://www.ilo.org/dyn/normlex/es/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R206

¹² Council of Europe Convention on preventing and combating violence against women and domestic violence, Istanbul, 2011. p. 3 <https://rm.coe.int/168008482e>

¹³ Law No. 4531/2018. Retrieved 29/09/2020 from : <https://www.e-nomothesia.gr/oikogeneia/nomos-4531-2018-phek-62a-5-4-2018.html>

	ratify the Istanbul Convention due to fierce public debate and strong opposition by some political parties, the church and other organisations.
European Union's Legislation (primary and secondary legislation)	
Articles 153 (par. 1a) and 157 (par. 3) of the Treaty on the Functioning of the European Union (TFEU)	European Union shall support and complement the activities of the Member States in improving the working environment for the protection of security of workers and equality between men and women with regard to opportunities in the labour market and treatment at work, and the adoption of measures to ensure the application of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation.
Council Directive 76/207/EEC1	The Directive prohibited unequal treatment on the grounds of sex as regards to access to employment.
Council Directive 2000/78/EC of 27 November 2000	The Directive established a general framework for equal treatment in employment and occupation ¹⁴ and defines harassment as discrimination aimed at violating a person's dignity and creating an intimidating, hostile, degrading and humiliating environment ¹⁵
Directive 2002/73/EC of the European Parliament and of the Council of 23 September 2002 (Equal Treatment Directive)	The Directive amended Council Directive 76/207/EEC on the implementation of the principle of equal treatment for men and women (Equal Treatment Directive) as regards access to employment, vocational training and promotion, and working conditions ¹⁶ . It was the first directive to define both sexual harassment and harassment related to sex at work: Harassment: <i>'where unwanted conduct related to the sex of a person occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment.'</i> Sexual harassment: <i>' where any form of unwanted verbal, non-verbal or physical conduct of a sexual nature occurs, with the purpose or effect of violating the dignity of a person, in particular when creating</i>

¹⁴<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32000L0078>.

¹⁵ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32000L0078>

¹⁶ Directive 2002/73/EC of the European Parliament and of the Council of 23 September 2002, repealed <https://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32002L0073>

	<p><i>an intimidating, hostile, degrading, humiliating or offensive environment</i>¹⁷.</p> <p>The Amended Equal Treatment Directive defined harassment related to sex and sexual harassment as discrimination and placed for the first time an obligation on Member States to specifically outlaw sexual harassment. It calls on member states to better protect the rights of victims of sexual harassment and to ensure the integrity, dignity and equality of women and men at work.</p>
<p>Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (Recast Directive)¹⁸.</p>	<p>The Directive merged six previous directives on equal treatment and repealed Directive 2002/73/EC. The recast Directive repeated the wording of the definitions of sexual harassment and harassment related to sex included in Directive 2002/73 and explicitly prohibits them.</p>
<p>Directive 2012/29/EU of the European Parliament and of the Council establishing minimum standards on the rights, support and protection of victims of crime (Victims' Rights Directive).</p>	<p>Recital 17 of the Victims' Rights Directive states that "<i>violence that is directed against a person because of that person's gender, gender identity or gender expression or that affects persons of a particular gender disproportionately, is understood as gender-based violence. Gender-based violence is also understood to be a form of discrimination and a violation of the fundamental freedoms of the victim and includes violence in close relationships, sexual violence (including rape, sexual assault and harassment), trafficking in human beings, slavery, and different forms of harmful practices, such as forced marriages, female genital mutilation and so-called 'honour crimes'.</i>"¹⁹</p>
<p>European Parliament (EP) resolutions:</p>	<p>Several recent EP resolutions have made a significant contribution to the future development of legislation on sexual harassment at work and policies to eliminate it²⁰.</p>

¹⁷ *Quid pro quo harassment* is the most commonly recognized form of sexual harassment. It occurs when job benefits, including employment and promotion, are made contingent on the provision of sexual favours, usually to an employer or supervisor. *Hostile work environment sexual harassment* is more difficult to identify and define. It occurs when an employee is subjected to conduct that has the purpose or effect of interfering with the employee's work performance or creating an intimidating or offensive work environment. Such harassment may include unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct based on the sex of the employee. This form of harassment is more difficult to identify than quid pro quo harassment because it does not involve a proposed or actual exchange of sexual favours for a condition of employment. http://stopvaw.org/Sexual_Harassment

¹⁸ Directive 2006/54 EC by the European Parliament and Council of 5 July on the application of the principle of equal opportunities and gender equality between men and women to work and employment issues. https://eur-lex.europa.eu/legalcontent/ES/TXT/?uri=uriserv:OJ.L_.2006.204.01.0023.01.SPA&toc=OJ.L:2006:204:TOC

¹⁹ <https://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32012L0029>

²⁰ See also European Parliament (2009), Resolution on the elimination of violence against women, P7_TA (2009) 0098, Brussels, 26 November 2009

<ul style="list-style-type: none"> • <i>Resolution of 14 March 2017 on equality between women and men in the European Union in 2014-2015</i> • <i>Resolution of 26 October 2017 on combating sexual harassment and abuse in the EU</i> • <i>Resolution of 11 September 2018 on measures to prevent and combat mobbing and sexual harassment at workplace, in public spaces, and political life in the EU.</i> 	<p>EP in its <i>Resolution of 14 March 2017 on equality between women and men in the European Union in 2014-2015</i>²¹ urges the Member States to focus special attention on gender-specific aspects of victims' rights, including in relation to new forms of violence against women and girls, such as cyber bullying, cyber-harassment, the use of degrading images online and the distribution on social media of private photos and videos without the consent of the people involved.</p> <p>In its <i>Resolution of 26 October 2017 on combating sexual harassment and abuse in the EU</i>²² EP calls on the Commission and the Member States, together with NGOs, social partners and equality bodies, to step up significant awareness-raising measures as regards the rights of the victims of sexual harassment and gender-based discrimination, to support and encourage women to report incidents immediately.</p> <p>Furthermore, the European Parliament has <i>adopted a Resolution of 11 September 2018 on measures to prevent and combat mobbing and sexual harassment at workplace, in public spaces, and political life in the EU.</i></p> <p>EP reiterates its call on the Commission to submit a proposal for a directive to tackle all forms of violence against women and girls and gender-based violence, which should include common definitions of the different types of VAW, including an updated and comprehensive definition of harassment (be it sexual or otherwise) and mobbing, and common legal standards on criminalising VAW. The EP calls on the Member States to develop comprehensive national action plans including staff training and sufficient funding, for equality bodies. Social partners should ensure that both public and private companies and organisations organise mandatory training on sexual</p>
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<https://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P7-TA-2009-0098&language=EN>

²¹ European Parliament resolution of 14 March 2017 on equality between women and men in the European Union in 2014-2015 (2016/2249(INI)) https://www.europarl.europa.eu/doceo/document/TA-8-2017-0073_EN.html

²² European Parliament resolution of 26 October 2017 on combating sexual harassment and abuse in the EU (2017/2897(RSP)) https://www.europarl.europa.eu/doceo/document/TA-8-2017-0417_EN.pdf

	harassment and bullying for all employees and those in management roles ²³ .
National Legislation	
Bulgaria	<p>The Law on Protection against Discrimination (LPD) of January 2004, as amended in August 2012, defines sexual harassment and explicitly recognises sexual harassment as a form of discrimination. The Art.17 provides for protection measures against sexual harassment in the workplace, and regulates that employers must hold inquiries regarding complaints and take measures to stop the harassment. The law explicitly recognizes sexual harassment as a form of discrimination and bans it. The EU definition of sexual harassment is fully recognized in the Bulgarian Law on Protection against Discrimination.</p> <p>According to the LPD an employer who has received a complaint from an employee who considers her/himself to be subjected to harassment, including sexual harassment at the workplace, is obliged to immediately inspect the case, take measures to stop harassment, as well as impose disciplinary measures if the harassment was committed by another employee. In case of non-fulfillment of this obligation, the employer shall be liable under the PDA for acts of discrimination committed at the workplace by his/her employee.</p> <p>The victim has also the right to lodge a complaint with the Commission for Protection against Discrimination - the body responsible for preventing discrimination, protection against discrimination and ensuring equal opportunities. It is a specialized public authority which controls the application and compliance with the Law on Obligations and Contracts or other laws on equality of treatment. The victim can also file a report to the territorial 'Labour Inspection' Directorate accompanied by detailed information on the case.</p>
Greece	<p>Law Nr. 1568/85 (Employer is responsible for the safety and health of employees in his company)</p> <p>Law No. 3896/2010 (Application of the principle of equal opportunities and equal treatment of men and</p>

²³ European Parliament resolution of 11 September 2018 on measures to prevent and combat mobbing and sexual harassment at workplace, in public spaces, and political life in the EU [2018/2055(INI)]. Retrieved 07.2020 from: https://www.europarl.europa.eu/doceo/document/TA-8-2018-0331_EN.html

	<p>women in matters of employment and occupation. SH constitutes an act of discrimination on sexual grounds)</p> <p>Law No. 4531/2018 (Ratification of the Instabul Convention of the Council of Europe regarding the violence against women)</p> <p>Law No. 4604/2019 (Promoting substantial gender equality, prevention and fight against gender violence)</p> <p>Greek Penal Code art. 337 (SH constitutes a crime: violation of sexual dignity)</p> <p>Greek Civil Code art. 57, 59, 914 and 932 (SH survivors can appeal to court and claim compensation for the moral or other damage they suffered)</p> <p>Law 4808/2021 (Ratification of the 190 Violence and Harassment Convention of the International Labour Organisation).</p>
Italy	<p>Article 26 of the 2006 Code of Equal Opportunities (Legislative Decree no. 198/2006) establishes "the equivalence between sexual harassment and gender discrimination" (Civil Court of Cassation, Labour Section, Judgment no. 23286 of 15 November 2016).</p> <p>Article 2087 of the Civil Code establishes "a general obligation of safety at work, imposing on the entrepreneur to take all necessary measures to protect the physical integrity as well as the psychological well-being of workers".</p> <p>Article 28 of Legislative Decree 81/2008 - Consolidation Act on Health and Safety in the Workplace</p> <p>The new paragraph 3-ter of Article 26 of the Code of Equal Opportunities about the employer's obligation, pursuant to Article 2087 of the Italian Civil Code, to provide working conditions that guarantee the physical and moral integrity and dignity of workers.</p> <p>Law No. 198/2006 (Code of Equal Opportunities) defines sexual harassment in the same terms used in the Convention and envisages civil remedies in cases of sexual harassment in the workplace</p>
Catalonia (Spain)	<p>In Spain, Organic Law 3/2007 of 22 March, for effective equality between women and men, prohibits sexual and gender-based harassment. It stipulates that companies and public institutions must promote</p>

	<p>working conditions that prevent sexual and gender-based harassment and establish specific procedures to prevent harassment and deal with any allegations or complaints made by individuals who may have been victims of such conduct.</p> <p>In Catalonia, there are two particularly relevant laws on this matter: Law 5/2008 of 24 April on women's right to eradicate sexist violence, and Law 17/2015 of 21 July for effective equality between men and women. Law 5/2008 defines the specific form of violence against women in the workplace and sets out that it can involve two types: sexual harassment and sex-based harassment.</p> <p>Law 17/2015 establishes measures to guarantee equality between women and men in access to work, in training and in professional promotion and working conditions, setting out measures on workplace health and safety and protection actions for sexual harassment and sex-based harassment.</p>
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Conclusions

There is a shared view that the comprehensive legislation is particularly important for identifying cases that constitute sexual harassment in the workplace, for defining reporting procedures and the roles of the various actors in the implementation of measures and policies for addressing SH. The legislation sets the context for combating sexual harassment in the workplace.

The review of national legislation in the project countries reveals gaps in the lack of specific legislation on gender-based violence, including sexual harassment, and especially in the implementation of legislation and the need to develop a specific law. Employers, Human Resources professionals and managers are able to actively contribute in the enforcement of the law in order to drastically reduce the prevalence of SH.

4. WHY BOTHER?

Prevalence of the phenomenon, contributing factors and consequences of SH

Prevalence of sexual harassment

The survey held in the four countries covered a **set of sexually harassing behaviours**. The findings show that the forms of sexual harassment that are most often practiced in the workplace are sexual suggestions or jokes that make people feel offended, unwanted sexual hints/suggestions, discussions about colleague's sex life, sexual comments about someone's appearance, body parts or clothes, and inappropriate touching, hugging or kissing. It is noteworthy that the various behaviours that represent cyber harassment are still not recognised as a form of sexual harassment in the workplace.

The picture that the survey findings outline shows that violence and sexual harassment are not limited to the kinds of incidents that make headlines. It includes a range of behaviours from verbal abuse, threats, and unwanted sexual advances to physical assault. They are a real fact that is present in every workplace and has many different manifestations that affect human dignity and create intimidating, hostile, degrading, humiliating or offensive work environment.

Factors contributing to SH in workplace

In order to eliminate SH, it is necessary to know what drives such behaviour. The further understanding of the factors and mechanisms that underpin sexual harassment and victimisation in the workplace is essential to inform the development of effective organisational policies and workplace practices.

The factors indicated by the respondents can generally be classified into three groups:

- **Societal** factors
- Factors related to the socio-psychological atmosphere, management and organizational style, and working conditions - **organisational** factors
- Factors related to the personality and behaviour of the colleagues - **personal** factors.

The factors outlined are important because they show where actions should focus when companies/institutions develop their policies.

The summarized results of the studies outline the following trends:

- **High prevalence** of SH against women in all four countries (*physical harassment or sexual blackmail in Italy*).

- **Most affected groups** - young women (*Greece, Spain, and Bulgaria*) and women in active working age (*Italy*). Moreover, one of the most vulnerable groups was found to be female employees with a migrant background, migrant domestic workers and caregiver (*Italy, Spain, and Greece*), women in unstable working conditions - women without job contracts (*Spain*), women with lower level of education (*Greece*).
- **Emergence of a new trend** in comparison to the previous surveys: the onset of the phenomenon of SH among men (*Italy*).
- **Emergence of new forms of SH** such as showing pornographic photos or images against the will of the person and, for Internet users, obscene or inappropriate proposals or comments, and identity theft on the Internet and social networks in order to write offensive or embarrassing messages about other people (*Italy*).
- **The perpetrator of SH** in most cases is a man. In the majority of cases, the perpetrators have a higher position than the harassed person (*Italy, Spain, and Greece*). The perpetrators are not only bosses and colleagues, but also clients and staff in third party workplaces (*Bulgaria – city transport and health care*)
- **Increased role of trade unions**, tools they put in place to react to the phenomenon and protect victims (*Italy*)²⁴.
- **Research-informed adoption of internal protocols or internal codes of conduct** to combat sexual harassment in the workplace within universities (*Italy*).
- **Blaming the victims** coexists with a high degree of normalisation (*Spain*.)
- **Underreporting** -- female harassment victims' mistrust the employer, policy or judicial bodies (*Spain, Greece*).
- **Limited knowledge on defining SH** (*Greece*).
- **Only few companies provide training** on the matter to inform the employees (*Greece*).
- **Negative consequences for the victims** - most women that had faced SH stopped working in this environment by resigning or by being dismissed (*Greece*).
- **Some companies/organizations established informal procedures**, which is not a successful practice (*Spain*).

Eliminating violence against women is still a challenge, as we do not yet have reliable and comparable data (statistical and research) to show decision-makers how widespread it really is and where the root causes for its sustainability in social and working life lie. The desk research reveals both gaps in research and in nationally representative statistical and recent empirical data on the real extent of sexual harassment in the workplace (*except Italy and to some extent, Spain*).

²⁴ Carla Pagano and Fiorenza Derio is entitled *Preliminary analysis on harassment and gender-based violence in the world of work in Italy* (ILO, April 2019); Daskalova, N. (2011) Female transport workers exposed to high levels of violence, Eurofound <https://www.eurofound.europa.eu/publications/article/2011/female-transport-workers-exposed-to-high-levels-of-violence>

The consequences of SH

The consequences of SH in the workplace is undoubtedly a problem, not only for the victims themselves, but also for the company and the society as a whole, because the negative effects are manifested in different directions and besides immediate, their effect is also long-term. Of all the participants in the quantitative survey who claimed that they have experienced some form of SH, only about 1/3 said that they have overcome the problem and are already calmly discussing it while ¼ of the respondents still have troubling memories going back to the experience and each fifth works under stress and tension. However, others chose an escape/refusal strategy leaving the job (15%).

Sexual harassment in all its forms is associated also with anger and aggression attacks, becoming "over sensitive", or suppressed and cautious. Other avoid thinking and talking about it or hardly concentrate in the work process, and feel powerless and guilty, having a sense of shame/feel misunderstood by colleagues or take it as normal behaviour; some reported to suffer from headaches, insomnia, anxiety, etc.

Perceptions of factors influencing the reaction of the victim

Most people who experience SH never report it. They fear the impact that complaining will have on their reputation, career prospects and relationships within their company. In general, fear of reporting harassment and sexual harassment was perceived as being on the rise, due to more precarious work conditions and more precarious terms of employment (Spain).

Of concern is that most of the respondents expected negative consequences for them. Fear of losing their jobs seems to be the most determining factor in people's **reactions after experiencing harassment** (70.8%), as well as shame/lack of understanding from their workmates (55,73%). The reaction of the victim is also impacted by Victim-blaming (40.89%), Fear of retaliation (44.27%), and Lack of effective protection procedures (39.84%) among other issues.

What is clear from these findings is that resisting to or complaining about SH is quite dangerous, resulting in employer's retaliation and firing as a common practice. Instead of receiving understanding and support, victims of violence are sometimes further humiliated by their colleagues and punished by the management. These findings show that the company protection policies need to be changed. Measures for supporting victims of violence should be introduced in the company policy. This would discourage potential perpetrators of SH but also guarantee to SH survivors that they would receive the appropriate support when reporting the incident.

5. WHY BOTHER?

Awareness and satisfaction with the company prevention/ protection policies and procedures

The survey findings reveal significant gaps in employees' awareness and satisfaction with policies and measures for prevention and protection in case of workplace sexual harassment.

The majority of respondents in the quantitative survey expressed **distrust in the commitment of the company management** to the prevention and response to sexual harassment. Just about 1/3 of the respondents believes that the employer/managers are completely committed. The highest is the share of the respondents from Greece, who think that the management is not at all committed to prevention of SH in the company (37%, namely managers in the public sector – 58%).

Over 60% of respondents stated that their organisation does not have **a document that contains clauses that prohibit sexual harassment** or do not know if there is such a document. The others point out that there are such clauses in various internal documents, including ethical code, internal company regulation, collective labour agreement, provisions of the Health and safety committee, etc. The practice of project countries is diverse and is reflected in the national reports. However, it seems that Italy has more comprehensive policy in this regard.

The analysis of existing policies and procedures related to reporting, victims support, and prevention/protection policies reveals gaps in awareness and satisfaction with the policies and procedures taken at their own company or organisation and identifies needs for future actions to be included in company/organization policy.

6. TRAINING NEEDS ASSESSMENT AT COMPANY LEVEL

The awareness raising campaigns and trainings are commonly recognised as a priority in the fight against sexual harassment as they can change minds and create intolerance of violence in the work place.

The survey findings reveal a serious gap in sexual harassment training, recognised by employers and employees, and by stakeholders that participated in our survey. The findings also reveal gaps in awareness both of the phenomenon of sexual harassment and the sexually harassing behaviours and of the company prevention/protection policies. Based on the identified gaps, the training needs in different areas have been determined.

State of play

As already mentioned one of the most worrying findings of the survey is the widespread lack of employee awareness and training on the company prevention/protection policies. This is largely due to the underestimation of the company/organisation training on sexual harassment as a key prevention tool.

Although there is extensive agreement on the need and interest in training and awareness raising, both among management and among employees, only a minority of the companies surveyed provide specific training on a regular basis to their staff.

Expressed willingness to participate in training

The survey findings register a high level of interest and willingness to participate in training on sexual harassment (61.5% of the respondents of the quantitative survey).

Content and target groups

The serious gaps identified in the study in awareness of SH and company policies at place can be overcome by developing training programmes, whose content and target groups are determined on the basis of needs assessment. Their content must be flexible enough to meet specific needs of the target groups and the specific context in the individual companies / industries. The programmes also need to be appropriate for use in businesses of all sizes, including in small businesses, which represents the major part of the economy of the countries involved in the project.

The training must focus on cultivating positive behaviours that create a zero tolerance to sexual harassment.

According to the employees, the greatest need for training is in the following areas:

- raising awareness about sexual harassment at the workplace,
- SH harmful consequences,
- confidentiality measures,
- the legislative framework,
- specific support for survivals,
- protection clauses in the Collective Bargaining Agreement,
- information on organisations offering support and statistics,
- analysis of such cases in company while maintaining anonymity,
- information on penalties for the perpetrators.

With regard to contents, the stakeholders interviewed in the qualitative survey emphasised on the need for a training aiming to inform on the matter of gender and gender-based violence and, later, consider the specific dynamics of sexual harassment in the workplace. Knowing the structural causes of harassment is essential for knowing how to detect and respond to it. The need is clarified also on strengthening the awareness training of employees and management on gender inequalities, gender-based violence and sexual harassment, in particular, as well as the reporting/notification channels and protocols to handle them. The importance of publicising the rights and obligations of the employer/manager and the staff, respectively, is also detected, as well as providing information about the services and support available specifically for victims.

7. CONCLUSIONS FROM THE RESEARCH

1. The phenomenon of sexual harassment in the workplace exists and covers different parts of the economy with different corporate types.
2. The commitment of the company or organisation is decisive in detecting and eradicating sexual harassment. Companies should publish and apply a zero-tolerance policy of these types of conducts. Giving a clear and forceful message to the entire staff prevents these behaviours both from occurring and from repeating.
3. Violence against women, including sexual harassment, is unacceptable and its elimination is a public responsibility. There is a need of common actions and shared responsibility of all stakeholders in this respect. To prevent workplace sexual harassment, primary prevention initiatives must not only address the possible perpetrators of sexual harassment in a workplace context but also in society more broadly.
4. The State should take an active role in displaying the extent of the problem.
5. A structured, multidisciplinary network for the systematic protection of female and male workers would be required in which trade unions, civil society, institutions and NGOs work together.
6. Social dialogue should focus on exercising pressure on the State and companies to successfully address the problem in cooperation with NGOs.
7. Research should be conducted in order to be aware of the extent and consequences of the problem.
8. Meetings of stakeholders should be organised in order to facilitate the dialogue, i.e. working groups where authorities, unions and organizations could share information, knowledge and experiences in preventing and handling SH.
9. Campaigns should be held with participation of all stakeholders, as well as trainings in companies organized by NGOs. The media should also be a part of the social dialogue.
10. To hold an assembly once a year on the subject of combating harassment and reporting procedures. The contents should be: procedures to be followed in cases of violence; information on workers' rights; promotion of territorial initiatives with trade unions and institutions; enhancement of local good practices; strengthening of existing networks. This could make it easier for victims to report abuses because they perceive and know

the protection networks around them.

11. Prevention is the area where the most effort must be made. Prevention measures would have to be aimed at modifying the conditions and structures that make harassment behaviours possible. Here is where both internal and external communication is essential. Besides a statement of zero tolerance, there is a need to develop and disseminate informational materials and conducting campaigns, raising awareness and training on sexual harassment, in addition to informing both new and old employees of the protocols, it is also important to make them accessible to all people linked to the organisation or company, such as users and subcontracted companies.
12. Greater attention must be placed on early detection of sexual harassment. An assessment of psychosocial risks in the framework of workplace risk prevention with a gender perspective can be a fundamental tool to prevent and identify new cases or situations of risk. And when harassment is detected, the organisation or company itself can initiate an investigation process on its own initiative.
13. The establishment of a policy protocol can be a means in and of itself of raising awareness and generating debate in the heart of the organisation. It is also a good opportunity to plan short- and long-term prevention actions. It is extremely important for the protocol to be specifically adapted to the operations and structure of each company or organisation, instead of limiting it to reproducing generalist instructions. The fact that protocols against sexual harassment are deemed to be a subject for collective bargaining is assessed as positive.
14. Support for victims of harassment is crucial. Indeed, the resolution process must be cross-cutting, as well as the design of measures to ensure the women's compensation and recovery. Ethical and psychological support must be included, but advice must also be provided in legal and regulatory terms for dealing with the resolution process.
15. The reference person or persons that could work independently from the human resources department should be in charge of collecting the claims and reports from the harassed person or a third-party witness, as well as notifying and providing support to the victim throughout the procedure, among other functions.

8. RECOMMENDATIONS

What Employers / HR managers/ Supervisors etc. should follow to successfully prevent and tackle Sexual Harassment in the Workplace

From the desk and field research conducted, the following recommendations for future actions seem appropriate:

8.1 Prevention Measures

Both in the results of the quantitative and qualitative survey, the scarce centrality placed on the measures for victims' recovery and reparation is shown. To counteract this shortcoming, applying a feminist perspective to resolving cases is recommended, promoting the individual and collective empowerment of victims and the social responsibility of companies and organisations for the damages caused at an individual and group level.

Considering that the most common way employees stated to receive information is the internet, employers/ HR managers/ supervisors etc. are encouraged to use the company's website and/ or social media to provide information to the employees regarding their rights and the procedures available in case of SH (designated person, authorities, trade unions, NGOs).

Simple and direct messages should be included, in order to enhance personal responsibility and collective efficacy, including ways one could contribute to the assistance of victims and ways to report such incidents.

In addition, awareness raising campaigns should be developed and disseminated through the internet, while all company members and employees should be encouraged to participate in seminars and trainings concerning SH.

The media that could be used would be social media, promoted advertisements in blogs, search engines, YouTube and online newspapers, as well as direct emails to managers and HR departments.

Companies should encourage all members of the staff to participate in relevant trainings, which can contribute in tackling SH by offering adequate and update information, eradicating stereotypes and increasing empathy and awareness.

8.2 Measures to create a culture of zero tolerance towards SH

The approach to eliminate violence in the workplace needs to change from the current reactive, complaints-based approach, to one which requires positive actions from employers and a focus on prevention. In other words, a widespread prevention strategy is required that has an impact on the causes of harassment. Furthermore, involvement and dedication, in terms of personnel and resources, are essential items for effective prevention and fair and satisfactory handling for both for victims and the organisation as a whole.

Therefore, employers/ HR managers/ supervisors etc. should get updated information on the extent and types of SH and circumstances concerning the legislation and legal procedures for its punishment.

They should be encouraged to establish a no tolerance policy in order to prevent and tackle SH, in company level or include such policy in a collective bargaining agreement if possible (see Annex A).

Another important aspect would be to collaborate with the relevant authorities, social partners and NGOs in meetings, events, info days and assemblies in order to receive information and contribute in raising awareness to the subject.

8.3 Measures to empower the victims of all genders to report SH and to protect victims and whistle-blowers

To successfully prevent and tackle SH, employers/ HR managers/ supervisors etc. should take action to eliminate the factor of fear experienced by victims and whistle-blowers to report an incident of SH.

For this reason, it is important to publicise the rights and duties of companies and staff, respectively, as well as providing information about the services and support available specifically for victims.

Establishing clauses on SH prevention and handling in company contracts as well as in Collective Bargaining Agreements in order to provide the employees with structured and effective protection could be crucial in the fight against SH.

8.4 Establishing safe paths for grievances and reporting SH and for ensuring that the complaint investigation process is transparent and procedurally fair

Simplified guidelines and procedures should be developed and established in all companies and organizations, explaining the steps one should follow to report and respond to such phenomena. Such measures should be properly disseminated (i.e., with trainings and info-days). Information regarding help lines and other available services, outside the company, should also be disseminated, so that victims can turn to other organizations, in case they fear or are unwilling to report relevant incidents in the context of their workplace.

The companies should establish a mechanism to support the survivors of SH ethically, psychologically and legally. A designated person could provide advice to the survivors on the steps he/she should follow to claim their rights. If the survivor wishes it, the designated person will begin the company's complaint mechanism (if available) which, if the complaint is proven to be true, would lead to the harasser's disciplinary punishment, even his/her dismissal (see Annex B).

Companies should also be encouraged to collect anonymized data for reported cases of SH in order to estimate the extent of the problem and the effectiveness of company's internal procedures.

9. ANNEX A.

SEXUAL HARASSMENT POLICY - A SAMPLE²⁵

The Policy Statement

[Name of Company] is committed to provide a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment (SH).

[Name of Company] will operate a zero-tolerance policy for any form of SH, treat all incidents seriously and promptly investigate all allegations. Any person found to have sexually harassed another will face a disciplinary penalty, up to and including dismissal from employment. All complaints of SH will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

Definition of sexual harassment

Sexual harassment is any unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g., touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy

²⁵ Source: ILO (International Labour Organisation)

- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

Even though sexual harassment affects women disproportionately, anyone can be a victim of sexual harassment. LGBT people and young men are also at higher risk of experiencing sexual harassment. What matters is that sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

[*Name of company*] recognises that sexual harassment is a manifestation of formal and informal power relationships and often occurs within unequal relationships in the workplace, for example between a manager or supervisor and employee. Anyone, including employees of [*Name of company*], clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within [*Name of company*] premises or outside, including at social events, business trips, training sessions or conferences sponsored by [*Name of company*].

10. ANNEX B.

COMPLAINTS PROCEDURES²⁶ - A SAMPLE

A. Designated Person to receive complains of SH

[Name of company] recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach the alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc. The designated person will record the incident and provide support and advice to the survivors on their next steps.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the company's procedures for dealing with the complaint
- discuss and agree on the next steps - a formal complaint, for example
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework
- provide support to the victim and refer her/him to specialized support services (if convenient).

Throughout the complaints procedure, a victim is entitled to be helped by a counsellor within the company. [Company name] will nominate a number of counsellors and provide them with special training to enable them to assist victims of sexual harassment. [Company name] recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. [Company name] understands the need to support victims in making complaints.

B. Company's complaints mechanism

²⁶ Be Aware – Strengthening competences to face sexual harassment on the workplace Agreement No. 2018-1-AT01-KA202-039286

The survivor may choose to follow the company procedures to report the incident. This does not deprive the survivor of the right to appeal to the authorities and court and report the incident at any time. If the survivor asks the designated person to follow the company's complaints mechanism, the designated person will refer the matter to the senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy (*Choose which options are most appropriate for your company*).

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately; confidentiality declaration to be signed by every one of them
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations. The investigation report should be strictly confidential on the 'need to know' principle basis
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e. a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if they cannot determine that the harassment took place, he/she may still make recommendations to ensure the proper functioning of the workplace
- keep a record of all actions taken
- ensure that all the records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within [...] days of the complaint being made

C. Public authorities responsible to receive complaints for SH

A person who has been subject to SH can also make a complaint outside of the company. They can do so through [*insert mechanism depending on country/legal framework – i.e. employment tribunal, ombudsperson, etc*]

D. Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion

- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of SH are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser. When the case does not require a disciplinary measure but the misconduct is confirmed the management investigation team will opt for measures such as training, coaching, monitoring and so on. Creating a culture of zero tolerance is very important at every step of the process.

E. Implementation of this policy

[*Name of company*] will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees and managers must be trained on the content of this policy as part of their induction into the company. Every year, [*Name of company*] will require all employees and managers to attend a refresher training course on the content of this policy and their rights and duties. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy and specifically of the reporting channels.

[*Company name*] will also regularly carry out awareness-raising actions (such as seminars and campaigns) on gender inequalities, gender-based violence and sexual harassment in the workplace to ensure all managers and employees are sensitized to the elimination of SH.

F. Prevention measures

[*Company name*] is committed to the prevention and early detection of SH. [*Name of company*] will take all necessary steps to ensure a management and organizational style and work environment free of discrimination and harassment. All employees are entitled to be treated with respect and dignity, regardless of their gender, sexual orientation, gender identity or expression. Managers are responsible for setting appropriate standards of behaviour, eliminating discrimination, providing equality of opportunity within their teams and for promoting a culture of tolerance and respect.

A Gender Equality Policy should be formulated and followed to address the structural factors contributing to SH, such as gender pay gap or gender segregation.

G. Monitoring and evaluation

[*Company name*] recognises the importance of monitoring this SH policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective. Supervisors, managers and those responsible for dealing with SH cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

11.ANEX C.

GOOD PRACTICES

Catalonia (Spain)

<p>“USV react project - Universities Supporting Victims of Sexual Violence”</p>	<p>The Universities Supporting Victims of Sexual Violence project is a partnership of 7 universities and associate partners across 6 European countries.</p> <p>Each partner university developed, piloted and evaluated a training programme for staff on receiving disclosures of sexual violence from students.</p> <p>The project began on March 2016 and ended with an international conference in November 2017. It was funded by the European Commission’s DG Justice, Rights, Equality and Citizenship Programme (DAPHNE strand).</p>	<p>This research project was led by Brunel University London with 7 partners from UK, Greece, Italy and Spain and associate partners from all these countries plus Latvia and Serbia.</p> <p>Project website: https://usvreact.eu/</p>
<p>The work done by the Labour Relations Council of Catalonia in relation to gender equality and the empowerment of women and girls and, more specifically, the actions taken to combat sexual harassment at work (Equality and Working Time Committee)</p>	<p>The Labour Relations Council (CRL) is the institutional participation and social dialogue body for employment issues in Catalonia; it is made up by the most representative trade unions and employers associations in partnership with the Government of Catalonia.</p> <p>The CRL is a stable space for consultation, social dialogue and institutional involvement. It has a committee-based structure. The Equality and Working Time Committee works to put an end to all forms of discrimination and violence against women.</p> <p>The Committee created tools for preventing gender-based and sexual harassment:</p> <ul style="list-style-type: none"> - Protocol to prevent and manage sexual and gender harassment at enterprises - Guide for drafting a protocol to prevent and manage sexual and gender harassment at enterprises 	<p>The Labour Relations Council of Catalonia is a stable social coordination body formed by the Department of Labor, Social Affairs and Families (Government of Catalonia), employer associations (Foment del Treball Nacional and Pimec) and trade unions (CCOO and UGT).</p>

	<ul style="list-style-type: none"> - 10 Commandments of zero tolerance of sexual and gender harassment at the workplace - Guidelines for the person in charge of protocols - Training programme for the reference person for protocols <p>The Council also offers free training on sexual harassment to companies across Catalonia.</p>	
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Greece

Name of the Initiative	Details	Organizer / Links
Initiatives undertaken by the social partners for restoring trust and strengthening their effective participation in the social dialogue	Thematic studies, policy papers, study visits and workshops on the matter of discrimination in the workplace between key stakeholders in Greece.	Trade union GSEE and employer unions SETE, GSEVEE, SEV, ESEE. 2014-2015. https://imegsevee.gr/en/projects/initiatives-undertaken-by-the-social-partners-for-restoring-trust-and-strengthening-their-effective-participation-in-the-social-dialogue
“EMBRACIVE- Embracing diversity and fostering inclusion in the workplace”.	The program aims to promote diversity in businesses both in Greece and in Cyprus, focusing on the need to create anti-discrimination practices and including the issue of SH. In the framework of this project, a “toolkit” will be developed as well as a guide for employers, managers etc. which will be piloted in 13 businesses.	Hellenic Federation of Industries” (“Sindesmos Epixiriseon kai Viomixanion” - S.E.V.”) and other stakeholders.2020. https://embracive.eu/

Italy

Name of the Initiative	Details	Organizer / Links
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<p>Improved Code of Conduct for the University of Bologna (some other institutions followed the example)</p>	<p>Students protested in the social media in order to improve and strengthen the Athenaeum's code of conduct against sexual harassment. the amendments to the code proposed by the Student Council were accepted: the time limit within which to report harassment was abolished (initially, it was 90 days) and the unacceptable possibility of the victim meeting the alleged perpetrator will exist only and exclusively upon the complainant's request (which is highly improbable), thus giving back centrality and power to those who decide to speak.</p>	<p>University of Bologna</p>
<p>Culture of Zero Tolerance towards SH in Italian Unions</p>	<p>In almost all Italian Regions, the trade unions (in particular CGIL and CISL) have organized a training program for their own staff and for companies in order to disseminate a culture of prevention and fight against the phenomenon of sexual harassment. These activities are carried out by their legal help desks by trade union representatives within companies, and by Equal Opportunities Commissions which are responsible for monitoring women's conditions in order to prevent and combat various forms of discrimination in the workplace. The Ministry of Labour has drawn up specific memoranda of understanding with the main trade unions to promote a culture of zero tolerance towards sexual harassment in the workplace.</p>	<p>CGIL and CISL (Italian Unions)</p>
<p>Agreement between Private Sector and Unions on SH</p>	<p>Private companies in Italy (mainly for transports): Several companies have recently implemented the agreement signed in January 2016 between Cgil, Cisl Uil and Confindustria, which is based on the assumption that any kind of harassment is unacceptable and must be exposed. Another fundamental aspect is the fact that companies must contribute in every way to maintaining a workplace in</p>	<p>Unions with Italian Private Companies</p>

	<p>which everyone's dignity is respected and protected.</p> <p>This agreement has been taken up by the public administration, by transport companies, by the postal service administration and also by several companies that are proposing or have proposed specific codes of conduct.</p> <p>The new contracts include, for example, an extension of the leave period for victims of harassment and, in some cases, of the financial coverage.</p>	
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Bulgaria

Name of the Initiative	Details	Organizer / Links
<p>Initiatives undertaken by the social partners for restoring trust and strengthening their effective participation in the social dialogue</p>	<p>Sectoral agreements against violence and harassment at work.</p>	<p>Union of Bulgarian Teachers, the Federation of Transport Trade Unions in Bulgaria (FTTUB) and the Federation of Healthcare Trade Unions. http://www.stsb.bg/ne-na-nasiliето/ http://www.sbug.info/sbug.php?page=1&lang=bg</p>
<p>Company policies</p>	<p>Specific document against harassment and sexual harassment in the workplace in company level</p> <p>The company does not tolerate discrimination and/or harassment of any kind. By imposing this policy and by training the staff, the company aims to prevent and/or correct behaviour that is in direct violation of this policy. All employees, regardless of their position in the company fall within the scope of this policy and are expected to respect the rights and obligations, as well as to take the necessary measures in case they notice indecent or inappropriate</p>	<p>www.novatrade.bg Nova Trade EOOD</p>

	<p>behaviour contrary to this policy. Managers who allow or tolerate discrimination, harassment or repression, including refusal to immediately report incidents related to this policy, are in violation of the policy and may be subject to disciplinary action</p>	
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