



teamwork<sup>2</sup>

combat sexual harassment  
in the workplace



## Teamwork 2.0

### *Policy Recommendations*

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## Introduction

This Policy Paper presents national recommendations for consideration by policymakers and decision-makers within the countries participating in the Teamwork 2 project. The aim of these recommendations is to inform potential improvements to local and European Union legislation addressing sexual harassment in the workplace.

The following countries are participating in the project: Greece, Bulgaria, Spain, Italy, Croatia, Cyprus and Belgium representing EU-wide outreach.

Through extensive work with national and EU-level stakeholders, the partnership has collected a number of best practices and recommendations for combating workplace sexual harassment.

### Greece

Greece ratified Convention 190 of the International Labour Organisation (ILO) in 2021 through [Law No. 4808/2021](#), marking one of the country's first comprehensive measures to combat workplace sexual harassment. However, while the legal framework is a crucial institutional tool - enforcing zero tolerance, providing accessible information and training, and mandating businesses with more than 20 employees implement relevant policies—its actual implementation remains challenging.

Cultural factors play a significant role in shaping workplace dynamics in Greece. Traditional gender norms and deeply ingrained social attitudes can make it difficult for victims to report harassment, fearing stigma, disbelief, or professional repercussions. Societal perceptions of what constitutes harassment can vary, often differing between men and women, leading to misunderstandings and a lack of consensus. Additionally, there is a tendency to downplay sexual harassment unless it involves extreme cases such as assault or rape. Addressing these cultural attitudes is key to making workplaces genuinely safe and inclusive.

### National Recommendations

#### 1. Inter-ministerial cooperation and coordination

Strategically consolidating strategies, functions, and knowledge across state services is essential to improve coordination and effectiveness. The effective prevention and detection of workplace sexual harassment require strong cooperation between the Ministry of Labour and other relevant Ministries and Authorities, including, the Ministry of Social Cohesion and Family, the Ministry of Interior, the Ministry of Migration & Asylum, the Labour Inspectorate, Ombudsman, the National Transparency Authority, and the Ministry of Education for raising awareness among students and future workforce.

#### 2. Comprehensive and inclusive legal framework

- The quality and coherence of legislation are crucial for ensuring legal and procedural security in addressing workplace sexual harassment.
- Integrating sexual harassment explicitly into broader anti-discrimination highlighting the intersecting nature of the phenomenon.

- The law should be extended to include small and medium-sized enterprises (SMEs), particularly in high-risk sectors like hospitality, where close working relationships make enforcement challenging. Similarly, mandatory anti-harassment policies should be introduced in the public sector to ensure equal protection across all workplaces.
- The legal framework should provide specific provisions for remote work, addressing digital harassment, surveillance concerns, and power imbalances in online communication.
- A holistic, gender-sensitive approach should be adopted in legislative efforts, covering employee-employer relationships, independent contractors, trainees and volunteers, job seekers and platform workers.
- Employers' associations and trade unions should develop targeted policies that account for the disproportionate impact of sexual harassment on pregnant and parenting women, women with disabilities, migrant women, LGBTQIA+ individuals and part-time workers.

### **3. Strengthening the role of Trade Unions and collective agreements**

- Restore and reinforce collective labor agreements to include binding provisions on sexual harassment prevention and response.
- Ensure collective agreements contain measures for protection and workplace policies against harassment.
- Strengthen the role of trade unions in advocating for a harassment-free workplace.
- Inclusion of sexual harassment prevention and response in the training agendas.

### **4. Protection and support for the survivors**

An effective institutional framework should be established to protect victims, ensuring

- a stable national policy for gender equality
- well-funded shelters and counseling centers
- 24-hour support hotlines and crisis centers
- specialized police units with trained personnel
- confidential and accessible reporting mechanisms
- the introduction of free legal assistance and financial support for those pursuing cases of sexual harassment.

### **5. Strengthening complaint and reporting mechanisms**

To ensure accessible, transparent, and effective complaint mechanisms, the following measures should be implemented:

- Clarification of roles and responsibilities of the Labour Inspectorate and relevant public authorities
- Removal of procedural barriers and improvement of reporting infrastructure
- Simplification of the bureaucratic processes by establishing specialised, fast-track mechanisms within the Labour Inspectorate and Ombudsman.
- Establishment of independent committees within businesses to handle complaints
- Multiple reporting mechanisms should be available, including external channels, to ensure that employees in smaller businesses also have accessible and reliable options for filing complaints.

- Adequate staffing and proper functioning of competent control bodies (e.g., Labour Inspectorate, Ombudsman)

## 6. Data collection and transparency

To enhance the effectiveness of policies, a systematic and coordinated approach is needed for:

- regular and reliable collection of workplace sexual harassment statistics,
- data sharing across Ministries and relevant Authorities
- annual publication of anonymised reports on incidents and prevention measures by businesses. The establishment of an Observatory for monitoring the implementation of law [No. 4808/2021](#) is also crucial.

## 7. Public awareness and education

Targeted awareness campaigns should be planned and implemented collaboratively, utilising government and ministries, Independent Authorities, national social partners and CSOs, media outlets, newspapers, and social media. These campaigns should inform citizens, employees, and employers about workplace sexual harassment, relevant legislation, and its broader benefits.

## 8. Training and capacity building

Training on sexual harassment should be a legal obligation for all workplaces, not left to individual discretion. Specialised training should be provided to public services, authorities, and businesses to ensure:

- Distinguishing acceptable behaviors from actions that may constitute harassment, while addressing social and gender norms and the cultural specifics of Greek society
- Intersectional and holistic approaches
- Consistent implementation of national legislation
- Discretion in handling complaints
- Consideration of personal circumstances, confidentiality, and privacy of complainants
- Preventive action plans in workplaces with significant informal employment (e.g., tourism, hospitality)
- Awareness of the relevant supporting actors at a national and local level.

## Bulgaria

In Bulgaria, while there is growing awareness of gender equality, there may still be a cultural tendency to overlook or minimize incidents of sexual harassment, especially in more traditional industries or workplaces. A stronger emphasis on **educating the public and employers** about the seriousness of sexual harassment may be needed. This would also involve a push for changing attitudes in traditionally male-dominated sectors (like construction or transportation) where harassment might be more prevalent but less reported.

### National Recommendations

#### 1. Existing Legal Framework in Bulgaria

- Bulgaria's legal framework already includes some provisions regarding sexual harassment, primarily through the Labour Code and related legislation (such as the Protection from Discrimination Act). However, enforcement is often insufficient, and there are challenges around the implementation of existing policies, especially in private companies or small businesses.
- Recommendation: better enforcement mechanisms to ensure that the current laws are actually followed and there are consequences for non-compliance. This could include more frequent audits of workplace policies by authorities.

## **2. Institutional Capacity**

- Bulgaria's institutions, such as the National Ombudsman and the Equal Opportunities Commission which is part of the Commission for Protection against Discrimination, play important roles in monitoring and advocating for women's rights, but they may not always have the capacity to handle sexual harassment cases comprehensively.
- Recommendation: need for capacity-building within these institutions to specifically handle workplace sexual harassment claims and increase the training of specialized staff in dealing with sensitive cases.

## **3. Support Systems for Victims**

- Victims of sexual harassment in Bulgaria may have limited access to legal or psychological support, especially in rural areas. Legal services may be expensive and there might be a lack of awareness about how to report incidents of harassment.
- Recommendation: need to expand victim support services, including legal aid, counseling and safe spaces for reporting harassment, especially in regions outside the capital, Sofia.

## **4. Alignment with EU Directives**

- Bulgaria is part of the European Union, and while the country is aligned with many EU policies on gender equality and non-discrimination, implementation can be slow or inconsistent in practice. The EU Directive on Gender Equality (2006/54/EC) could be reinforced in Bulgaria by strengthening the legislative tools that are already available.
- Recommendation: accelerate the alignment of national policies with European norms, particularly by drawing on best practices from other EU member states.

## **5. Role of Trade Unions**

- Trade unions in Bulgaria, especially in certain sectors, could play a more active role in advocating for workplace protections against sexual harassment. Encouraging them to be more involved could create a stronger bottom-up approach to addressing this issue.
- Recommendation: promoting the role of trade unions in ensuring accountability in workplaces and supporting victims in navigating their legal options.

## **6. Independent Investigation Bodies**

Develop an independent body to handle sexual harassment claims in the workplace, separate from employers or corporate HR departments. This will ensure objectivity and thoroughness in investigations, especially in large organizations.

## **7. Regular Training for Employers and Employees**

Make it mandatory for all employees, especially in managerial roles, to undergo training on sexual harassment prevention. This training should also include practical tools for recognizing and addressing harassment, especially in traditionally male-dominated industries.

## 8. Legal regulation

Regarding the legal regulation of issues related to sexual harassment in the workplace, legislative initiatives are needed in Bulgaria. All issues can be included in a separate Law on Sexual Harassment in the Workplace. Creating and proposing such a law is a long process and will take time. Therefore, changes to current laws concerning labor rights and relations are needed as soon as possible.

It is extremely important that the expression "sexual harassment in the workplace" is included in the Labor Code, which is currently missing there. Its inclusion, for example, in the chapter concerning working conditions, as "the employee's right to work, a workplace and a working atmosphere free from sexual harassment" will open the way for employers and organizations defending labor rights to lobby and insist at the national level for the introduction of procedures protecting workers from sexual harassment as mandatory internal rules in companies and institutions in Bulgaria.

## Spain

The following recommendations for Spain focus on strengthening public policy and workplace measures to prevent and address sexual harassment, with an emphasis on systemic change and intersectionality.

### *National Recommendations*

#### 1. Comprehensive public policy

- Adopt the new framework protocol proposed by the Catalan Ministry of Equality and Feminism, which integrates prevention and comprehensive reparation with due diligence in cases of sexist violence.
- Ensure that prevention strategies include guarantees of non-repetition by addressing structural causes.

#### 2. Enhance, Systematize, and Deepen Workplace Harassment Policies

- Develop systematic, continuous, and mandatory training for managers, HR professionals, and union representatives on identifying, addressing, and preventing sexual harassment.
- Provide training programs to ensure that anti-harassment policies are not just formal documents but practical and enforceable tools, while also ensuring that workers are aware of these policies and know how to access and implement them.
- Move beyond isolated measures by integrating prevention strategies into broader workplace policies to develop a more circular and sustainable approach.
- Expand the approach to workplace harassment by addressing multiple forms of discrimination beyond gender, recognizing the intersecting factors that impact

## Italy

Preventing workplace harassment requires a cultural shift within organizations, but to be truly effective, it must go beyond a one-size-fits-all approach and recognize the structural inequalities that make certain groups more vulnerable. Workplace harassment is deeply tied to power dynamics, which are influenced not only by professional hierarchies but also by social identities such as gender, race, nationality, sexual orientation, and socioeconomic status. Individuals with less dominant social identities often face a higher risk of discrimination, exclusion, and abuse.

Recent data from ISTAT (Italian National Institute of Statistics) from 2022-2023 underscores this reality:

- 13.5% of women aged 15–70 reported experiencing sexual harassment at work, with this figure rising to 21.2% among younger women (15–24).
- 2.4% of men in the same age group reported similar experiences.
- An ISTAT/UNAR survey revealed that 50% of LGBTQ+ individuals experienced discrimination during job-seeking.
- 37.1% of transgender and non-binary individuals reported facing hostile work environments or microaggressions.

These figures highlight the need for an intersectional perspective in tackling workplace harassment.

### *National Recommendations*

**1. Adopt an Intersectional Approach to Prevent Workplace Harassment.** To build a truly inclusive workplace, organizations must implement concrete measures such as:

- Align recruitment strategies with diversity and inclusion principles to ensure equitable access to employment.
- Strengthen whistleblower protections by providing safe and anonymous reporting mechanisms.
- Offer tailored psychological and legal support services for employees from marginalized groups.
- Deliver comprehensive training to both managers and staff on the specific challenges faced by vulnerable populations.
- Establish mentorship and sponsorship programs to promote career advancement for underrepresented groups.
- Ensure diverse representation in leadership and decision-making roles.
- Foster an inclusive culture through open dialogue on discrimination, bias, and equality.

Organizations must adopt an intersectional approach to address harassment, ensuring policies reflect the diverse experiences of employees. This creates a workplace where all individuals feel safe, valued, and empowered, regardless of their identity.

**2. Countering sexual harassment to improve corporate welfare.** Given how much time people spend at work, ensuring a safe and respectful environment is essential for both individual well-being and organizational health. Harassment and discrimination, whether verbal, physical, or psychological, not only harm victims but also damage team morale, productivity, and the overall workplace climate.



- **Training as Prevention:** Include training for employees and managers on cultural sensitivity and mutual respect.
- **Clear Reporting Procedures:** Establish clear and accessible procedures for reporting incidents of harassment or discrimination.
- **Promote Corporate Culture:** Foster a workplace culture based on diversity, inclusiveness, and respect.

Fostering such an environment is not only a legal and ethical obligation, it's a strategic investment in employee satisfaction, talent retention, and sustainable success.

## Croatia

The project's local HELPDESK pilot in Croatia revealed that nearly half of the complaints were anonymous, highlighting victims' lack of trust in the protection system, prosecution effectiveness, and institutional support. Despite a comprehensive legal framework, victims often avoid reporting or do so anonymously due to fear and systemic failures, including delayed investigations and inadequate punishment for offenders. The pilot also showed strong demand for support services and education, surpassing the project's capacity. Employers frequently resist implementing zero-tolerance policies, often covering up incidents or deferring responsibility, especially in cases involving senior staff. This reluctance stems from entrenched patriarchal norms. Large companies may enforce policies selectively while overlooking broader workers' rights. Addressing sexual harassment in isolation, without tackling the cultural and structural roots of gender-based violence, is ineffective and potentially harmful. A more holistic, systemic approach is essential.

### National Recommendations

Given these persistent challenges, despite recent legislative reforms in the country, the following recommendations to improve practices and strengthen the social, institutional, judicial, and legal framework for combating sexual harassment are put forward for Croatia:

1. **Address the root causes**—the culture of violence—by prioritizing gender equality education, fostering social solidarity, and promoting diversity acceptance. Comprehensive education on peaceful conflict resolution, gender equality, and inclusivity—including age-appropriate sex and health education—must begin in early childhood and extend across all levels of society. An intersectional, long-term prevention strategy is essential to dismantle systemic foundations of this violence.
2. **Formalize cross-sectoral cooperation** by establishing clear legal and procedural frameworks for collaboration between police, prosecutors, judiciary, and health/social institutions in sexual violence cases.
3. **Mandate specialized, ongoing training** for judges, prosecutors, and workplace dignity commissioners on gender-based and sexual violence, alongside integrating gender equality education into all academic institutions. Enhance police training on investigating and prosecuting sexual violence.
4. **Legally require minimum standards regardless of workforce size in the Labor Act for all employers** (public/private) and educational institutions, obligating them to adopt and enforce these standards.

- 5. Raise awareness of the issue's impact on women's labor market participation and broader socioeconomic/demographic consequences.**
- 6. Launch public campaigns to educate and sensitize society, alongside legislative reforms.**
- 7. Engage men as active allies in combating discrimination based on sex and gender-based violence.**
- 8. Ratify ILO Convention No. 190 (2019) to commit to preventing workplace gender-based violence and harassment, with a focus on protecting women and girls.**
- 9. Require state-affiliated employers to publicly report data on dignity protection proceedings.**
- 10. Strengthen national preventive mechanisms to ensure systemic accountability.**

## Cyprus

During the finalisation of this Policy Paper, new legislation with significant advancements in employee protection was passed in Cyprus on the 27th March. The Violence and Harassment in the Workplace Law of 2025, establishes criminal penalties for workplace intimidation and creates comprehensive frameworks for addressing complaints. The new law provides expansive definitions of workplace harassment and violence, covering a range of environments beyond traditional office settings. According to the legislative text, protected locations include:

- Areas where employees are paid, rest, or dine
- Work-related trips, training sessions, events, and social activities
- Work-related communications, including those facilitated by information and communication technologies
- Employer-provided accommodations
- Commuting to and from work

In addition, the legislation extends protections beyond traditional employees to include third parties with customer or contractual relationships, service providers, and visitors to workplaces.

The law grants substantial enforcement powers to the Labour Inspection Service, which will be responsible for investigating complaints.

While the Cyprus law provides a framework for addressing sexual harassment in the workplace, there are areas where it could be further improved. The current legislation is not specific as to the extent or repetition of training on sexual nor does it address the fear of victims to report incidents.

### *National Recommendations*

#### **1. Strengthen Prevention Measures with mandatory inclusive policies and training for employers**

- Ensure the policies are inclusive and address the needs of all employees, including those from diverse backgrounds and marginalized communities.
- Promote gender equality and respect in the workplace through diverse hiring practices and inclusive policies.
- Start by implementing training aligned with EU's LifeComp framework which equips people with competencies for life. LifeComp is a "manual on how to be a human!" and can help plant the seed for treating others with dignity at all times.
- Making training programs on sexual harassment and the code of conduct for all employees, supervisors, and employers mandatory upon their start of employment. A good practice is to include it in Induction and Onboarding programs of new joiners.
- Mandate regular training for all employees on sexual harassment prevention, bystander intervention, and promoting a respectful workplace culture. Regular refresher courses to keep everyone updated on the latest laws and practices, at least every 2 years, should be made mandatory by law.

#### **3. Promote Transparency and Monitoring**

- Establish anonymous or confidential reporting options to protect the identity of victims during the initial stages of the complaint and ensure that these mechanisms are easily accessible and well-publicized within workplaces.
- Requiring employers to collect and report data on sexual harassment incidents to track progress and identify areas for improvement would place more emphasis on the importance of reporting, to make survivors and/or bystanders of sexual harassment feel more confident to report incidents without fear of retaliation.
- Conduct regular audits to ensure compliance with the law and the effectiveness of the implemented measures.
- Regular assessments of workplace culture to identify and address potential issues before they escalate.
- Establish a system for employees to provide feedback on the effectiveness of the harassment prevention measures.
- Use the feedback to continuously improve policies and practices.

#### **4. Provide Support for Victims**

- Mandate that employers have to ensure that survivors of sexual harassment have access to legal aid, counseling, and other support services.
- Provide government funding to establish a nationwide dedicated helpline for immediate assistance and guidance. Ensure victims are informed about their rights and the available protection measures.

- Provide access to psychological counseling and legal support for victims throughout the reporting and legal process.
- Establish support groups or networks to help victims feel less isolated and more empowered to come forward.

## 5. Legal Anonymity Provisions

- Introduce provisions that allow victims to remain anonymous during legal proceedings.
- Use pseudonyms or initials in court documents and during hearings to protect the identity of the complainant.
- Allow for closed or private court hearings in cases of sexual harassment, where only the necessary parties are present. This can help protect the victim's identity and reduce the fear of public exposure.

## 6. Strict Penalties for Retaliation

- Enforce strict penalties for any form of employer retaliation against victims who report harassment.
- Make it clear that any adverse treatment resulting from the reporting of harassment will be met with severe legal consequences.

## 7. Independent Investigation Bodies

- Set up independent bodies or committees to handle harassment complaints, ensuring impartiality and confidentiality. This can help build employees' trust and confidence in the reporting process.
- By implementing these changes, the legal system and the law can create a more supportive environment for victims, encouraging them to report incidents without fear of public exposure or retaliation.

## EU Level Recommendations

### General Recommendations

- **Legislation:** Comprehensive policies must address all forms of harassment, including cyber violence and its psychological risks. Workplace harassment must be recognised as a systemic issue requiring sustained action.
- **Education and Training:** Awareness-raising initiatives should be integrated at multiple levels, from schools and universities to vocational training and workplace policies. Employers must proactively prevent workplace harassment through tailored training programmes and clearly formulated preventative mechanisms.
- **Effective Policies and Procedures:** Preventive and corrective procedures should be properly implemented and contain clearly defined tools and mechanisms transparently communicated to all employees. It is important that these procedures do not place responsibility on victims. They should also be designed inclusively, reflecting diverse lived experiences of the staff. Moreover, employers should support employee resource groups to promote gender equality and foster peer-learning.
- **Addressing Technology-Facilitated Harassment:** Workplace policies must include cyber violence, ensuring that all staff are informed about its impact.

- **EU Life Competence Framework (LifeComp):** This framework should be integrated into all training to foster critical thinking and a culture of equality. Collaboration among various actors, including educators, social economy organisations, and advocacy groups is essential for long-term progress.
- **Improved Data Collection:** Comprehensive research is needed to help researchers and policymakers understand the scope of workplace harassment and develop targeted solutions.

Regarding the use of Helpdesks across Europe, we recommend to:

1. **Adopt a community approach in the reparation procedures.** The harassment event can not only affect the person who has suffered it, but the prosecutor (in rare cases) and the community as well
2. **Establish a survivor-centered approach.**
3. **Strengthen information and sensitisation for employees**
4. **Enhance awareness-raising activities: introduce training in vocational pathways or university courses**
5. **Work on cultural change**
6. **Ensure an easily accessible place**
7. **Provide different channels for reporting, even the anonymous one**
8. **Pursue justice and a right-based approach** to avoid the fact that a victim who has reported, will be the one facing the consequences of the offence

These EU-level recommendations synthesize the national-level recommendations, emphasizing common themes such as the need for comprehensive legislation, robust prevention and training programs, victim support, and improved data collection.