

be!aware

IO3 DISTANCE & FTF TRAINING COURSE: DEVELOPMENT OF SYSTEMIC PREVENTION MEASURES AND SUPPORT IN ORGANISATIONS

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Abstract

Sexual harassment at the workplace is a form of discrimination that includes any uninvited behaviour, comments or conduct regarding sex, gender or sexual orientation. It is estimated that six out of ten women in Europe have endured sexist treatment or suffered sexual violence during their careers (The Parliament Magazine, 2019).

Sexual harassment causes serious consequences for organisations such as fear and anxiety or shame between employees which leads to reduced productivity and performance and eventually affects the whole functioning and development of the organisation (Policy Department for Citizen's Rights and Constitutional Affairs, 2018).

Be Aware suggests a systematic approach by providing different tools and methods to improve the professional development of HR managers, VET trainers, teachers, mediators and workers' representatives for reducing sexual harassment. The project outcomes will improve their capability to deal with the matter of sexual harassment at the workplace professionally and help to become a so-called Be Aware mentor.

This intellectual output "Distance and FTF Training Course" includes three main parts. After an introduction to the project itself, there is a brief summary of the main terms that the user needs to know beforehand. Then, the text goes on to talk about how companies, employers and employees can install prevention measures. The next part will go deep into the development of an action plan: the steps that have to be taken, as well as the training table and the description of all the activities that the partnership working in this project proposes. The third part contains the different resource systems in all partnering countries that can be helpful for both those affected by sexual harassment and also for those companies that want to get some guidance on how to improve their situation.

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1. GENERAL INFORMATION

1.1. Project Description

Sexual harassment at the workplace is a form of discrimination that includes any uninvited behaviour, comments or conduct regarding sex, gender or sexual orientation. Sexual harassment is a type of gender discrimination. According to The International Labour Organization, quoting UN figures, in the EU between 40 and 50 per cent of women experience forms of sexual harassment at their workplace¹.

As the workplace provides relationships of dependence it is often very hard for the harassed employee to both stop the unwanted behaviour and/or to report it. Affected persons blame themselves or hope that the conduct will stop on its own. This is especially the case if the harassed persons are in a hierarchically inferior position and thus do not dare to talk about the issue. They try to deny the existence of the problem or fault themselves for its occurrence. Fear of losing employment or feelings of shame make it difficult to report the incidents.

If a case of sexual harassment being reported, it is the responsibility of the employer to act. But it can often be observed that either there is no employer complaint mechanism or grievance system installed or superiors and workers' representatives lack the sensitivity and competence to deal with the matter. This usually stems from a lack of or insufficient quality of training, as well as a general feeling of ambiguity when dealing with the topic. In this sense, it is especially necessary to promote initiatives and actions aimed at reducing this problem.

Therefore, we identify the following needs:

- The implementation of quality training for workers' representatives and supervisors who might be addressed by an affected person.
- The promotion of adequate prevention strategies within organisations.
- To raise awareness and inform employees about the legal situation, their rights and expected behaviour.

In accordance with these needs in this project, VET training is developed. The trainees will, after completing the training, be so-called Be Aware Mentors.

1.2. Main Definitions

Before addressing the general Be Aware approach an understanding of where sexual harassment is situated, terminology wise, seems important. The following passage should enable readers to understand what sexual harassment is, where it is situated, both in research

¹ https://www.ilo.org/global/about-the-ilo/newsroom/features/WCMS_205996/lang-en/index.htm (January 8, 2020)

and in distinction to other terminology. Also, this first section will underline the aspect of intersectionality, when sexual harassment is discussed. In its roots, sexual harassment is a women’s issue, as a woman is sexually harassed because she is a woman (Fitzgerald, L.F. & Cortina, L.M, 2018).

This first passage will point out how sexual harassment needs to be understood as a matter of power systems. And how strategies to raise awareness, reduce risks of sexual harassment and, if sexual harassment occurs, professionally take action, need to be looked at in the context of power. Also, it is important to understand, that sexual harassment has nothing to do with romance, desire or sexuality itself.

Discrimination

Discrimination can be divided into two main areas, access and treatment discrimination. Whereas access discrimination refers to unequal access to jobs or positions, treatment discrimination relates to the inequality of procedures in organisations. (Raver, J.L. & Nishii, L.H., 2010).

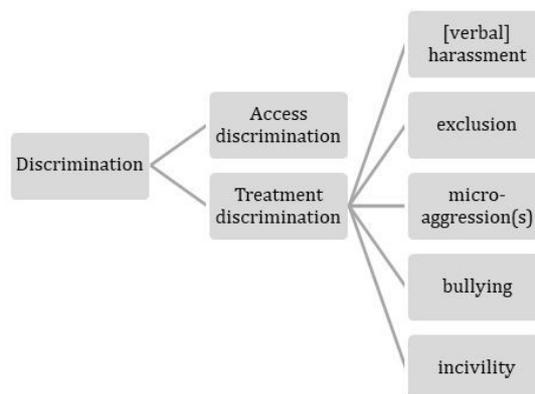


Figure 1: Types of discrimination.jpg (Raver, J.L. & Nishii, L.H. 2010)

Harassment

Harassment can be based on various identity group characteristics: e.g. race, gender, disability, religion, national origin, sexual orientation (Raver, J.L. & Nishii, L.H. 2010). Targets of harassment often experience multiple forms of mistreatment, e.g. gender and ethnicity. From an intersectional standpoint, everybody inhabits multiple social locations. These are based on gender, race, class etc. and their levels of privileges and power vary. (Fitzgerald, L.F. & Cortina, L.M, 2018).

Sexual harassment, in research commonly referred to as “gender harassment”, can furthermore be differentiated in:

- sexual/gender harassment
- unwanted sexual behaviour
- sexual coercion

Fitzgerald & Cortina divide them in “come-ons” (unwanted sexual behaviour and sexual coercion) and “put-downs”. The researchers suggest to “use the term sexual harassment to refer to a pattern of experience, not a legal finding of fact. Sexually harassing experiences are outnumbering the legal cases that are filed.” (Fitzgerald, L.F. & Cortina, L.M) Out of the three differentiated types mentioned above, sexual harassment is the most widespread. As it does not seek an actual sexual act, but rather an insult, a downgrading or despicable attitude towards others, gender harassment is more precise than sexual harassment. (Fitzgerald, L.F. & Cortina, L.M). This form of harassment has nothing to do with romance or desire and sexuality per se but only with gender. Sexual harassment is fundamentally about gendered systems of power (Fitzgerald, L.F. & Cortina, L.M).

1.3. Target groups

Target groups to carry out the training are workers representatives, HR managers, trainers and mentors, people who are in the position in an enterprise to support people affected by sexual harassment and protect them.

For effectively preventing and reducing sexual harassment, target groups of this training can be external and internal – people are trained within organisations so that they know how to deal with sexual harassment between their own colleagues and employees. This also provides opportunities for persons affected by sexual harassment to reach out for help or support inside the organisation. Nevertheless, people affected by sexual harassment are likely not to report the problem to internal representatives and sometimes might feel more comfortable with reaching out to an external person, who is not necessarily connected to the organisation and its’ employees.

Thus, this training aims to prepare both internal and external support such as Be Aware mentors for employees who have experienced or currently deal with sexual harassment at their workplace.

1.4. Objective of the training

The distance and face to face (from now on referred to as FTF) course shall serve to train the target groups previously mentioned as Be Aware mentors; this is, to sensitise them for the problems of sexual harassment at the workplace and make them aware of their responsibility. After the training, they shall be able to train their staff in their organisations and make them aware of the problems related to sexual harassment.

Objectives for this training:

- To train and prepare a Be Aware mentor for preventing and dealing with sexual harassment at the workplace.
- To raise awareness of sexual harassment at the workplace and minimise risks for it to occur by providing knowledge on identification of sexual harassment as well as on gender and diversity issues.
- To familiarise participants with power relations at the workplace, which often cause or support sexual harassment.
- To provide recommendations for a sexual harassment policy at the workplace.
- To enhance capacity in managing change at the workplace by understanding organisational structure and culture as key components of effective change.

1.5. Training Standards

The quality standards for Be Aware training aim to address the effectiveness of the proposed innovative qualification – Be Aware mentors. They were developed using the principles of the European Quality Assurance Reference Framework for Vocational Education and Training (EQARF). This document is intended to serve as a reference instrument to help Member States to promote and monitor the continuous improvement of their Vocational Education and Training (VET) systems, based on common European references.

Quality standards for the content of the training programme “Awareness in organisations”

- The training programme should overview the benefit for both the employee and the employer of implementing the Be Aware project within the organisation.
- The training programme should deepen participants' knowledge of equal treatment for all and the prohibition of multi-discrimination at the workplace by analysing cases of discrimination and harassment at the workplace.

- The training programme should provide definitions of the concepts of discrimination and sexual harassment, diversity, organisational structure and culture.
- Learning materials and case studies should help to recognise the influence of gendered power relations, organisational structures and cultures on sexual harassment at the workplaces.

Quality standards for the methodology of the training programme “Awareness in organisations”

- The training methodology should facilitate the combination of face-to-face (FTF) training and e-learning training with the possibility to study at the workplace or else via the developed e-learning platform.
- The training methodology should be adapted to the participant’s and companies’ needs, work situation and expectations, which have to be analysed during the first FTF session.
- The combination of theory and practical exercises should be ensured within each training session.
- The Be Aware training course should be finalised with an assessment of the participant’s acquisition of knowledge.
- The Be Aware training should provide a certification of the participant’s acquisition of knowledge.

Accreditation of the Be Aware training should be implemented in accordance with the country’s national system for recognising and validating training programs.

2. CONTENT FOR “TRAIN THE TRAINER”

The training must be aimed to tackle the problem straight at its root: preventing sexual harassment from happening in the first place. This training wants to be interactive, flexible, and easily accessible to all employees, ensuring throughout the process that everyone understands and progresses properly. In this case, the training will be carried out through two modalities: distance and FTF and it can include peer coaching, presentations, discussions, workbooks, group activities and Q&A. The training must be adapted to the necessities and characteristics of each corporation.

It is effective to use unconventional methods that include video formats, animations and interactive games, as well as taking great care of the language and not using words like “harasser” or “the person suffering from harassment”, words that almost everyone finds difficult to identify with.

The distance and FTF course shall train the trainees to become Be Aware mentors, which means to sensitise them for the problems of sexual harassment at the workplace and make them aware of their responsibility. They shall be taught how to deal best with sexual harassment at the workplace and how to implement structures of prevention. Thus, their competences with dealing with sexual harassment in training and at the workplace will be significantly increased.

2.1. Legislation about Sexual Harassment at European level

Legislation on the topic of sexual harassment at the workplace is divided into three levels - international, European and regional (in the countries).

- International level:

United Nations legal instruments in the field of human rights and notably of women’s rights such as the Charter of the United Nations, the Universal Declaration of Human Rights, the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights, the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW) and its Protocol, and the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment.

UN instruments on sexual harassment and violence against women, such as the Vienna Declaration and Programme of Action of 25 June 1993 adopted by the World Conference on Human Rights, the Declaration by the United Nations General Assembly on the Elimination of Violence against Women of 20 December 1993, the Resolution on crime prevention and criminal justice measures to eliminate violence

against women of 21 July 1997, the reports by the UN Special Rapporteurs on violence against women, and General recommendation No 19 by the CEDAW committee; Istanbul Convention on preventing and combating violence against women and domestic violence, in particular Articles 2 and 40 thereof. In this regard is the Parliament's resolution of 12 September 2017 on the proposal for a Council decision on the conclusion, by the European Union, of the Council of Europe Convention on preventing and combating violence against women and domestic violence.)

- European level: Any action taken by the EU is carried out under the treaties. These binding agreements between the EU Member States set out the EU's objectives, the rules for the Union's institutions and the relationship between the EU and the Member States. The Treaties are the starting point for EU law and are known in the Union as "primary law". Legislation based on the principles and objectives of the Treaties is known as "secondary legislation" and includes regulations, directives, decisions, recommendations and opinions.
 - Primary laws for the topic of Sexual harassment at the workplace: Articles 2 and 3 of the Treaty on European Union (TEU), and Articles 8, 10, 19 and 157 of the Treaty on the Functioning of the European Union (TFEU)
 - Secondary legislation for the topic of Sexual harassment at the workplace:
 - Charter of Fundamental Rights of the European Union, which entered into force with the adoption of the Treaty of Lisbon in December 2009, and, in particular, Articles 1, 20, 21, 23 and 31
 - 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 - OJ L 204, 26.7.2006, p. 23.
 - Council Directive 2004/113/EC of 13 December 2004 implementing the principle of equal treatment between men and women in the access to and supply of goods and services, which defines and condemns harassment and sexual harassment - OJ L 373, 21.12.2004, p. 37.
 - Directive 2012/29/EU of the European Parliament and of the Council of 25 October 2012 establishing minimum standards on the rights, support and protection of victims of crime, and replacing Council Framework Decision 2001/220/JHA (the Victims' Rights Directive)

- Framework Agreement on Harassment and Violence at Work of 26 April 2007 between ETUC/CES, BUSINESSEUROPE, UEAPME and CEEP
- Resolutions of 20 September 2001 on harassment at the workplace - OJ C 77 E, 28.3.2002, p. 138.
- Resolutions of 14 March 2017 on equality between women and men in the European Union in 2014-2015, of 10 March 2015 on progress on equality between women and men in the European Union 2013, and of 24 October 2017 on legitimate measures to protect whistle-blowers acting in the public interest when disclosing the confidential information of companies and public bodies - Texts adopted, P8_TA(2017)0402.
- Resolution of 26 October 2017 on combating sexual harassment and abuse in the EU - Texts adopted, P8_TA(2017)0417
- European Trade Union Confederation report entitled 'Safe at home, safe at work –Trade union strategies to prevent, manage and eliminate workplace harassment and violence against women.
- Study entitled 'Bullying and sexual harassment at the workplace, in public spaces, and in political life in the EU', published by Directorate-General for Internal Policies in March 2018 – regard to Rule 52 of its Rules of Procedure
- Study –'Bullying and sexual harassment at the workplace, in public spaces, and in political life in the EU', European Parliament, Directorate-General for Internal Policies, Policy Department for Citizens' Rights and Constitutional Affairs, March 2018.
- Report of the Committee on Women's Rights and Gender Equality (A8-0265/2018)

These are the main legal texts that define the legal protection in the field of sexual harassment at the workplace. In addition, on a practical level are the laws of specific countries and their internal interpretations of terms related to harassment at the workplace and the types of harassment that laws and regulations adopt and sanction.

2.2. What is harassment?

Section 1.2. *Main Definitions* of this guide has already dealt with the term harassment. However, now we will go deeper into what this concept means in the working environment. Harassment is a very serious problem at the workplace, and not only in legal terms - since the same laws that prohibit gender discrimination prohibit sexual harassment-, but it is also a

problem for employers. It limits fundamental rights and freedoms and it may entail a crime against the integrity of a person. On a secondary level, it also affects the work environment and the productivity of the company and its employees.

Therefore, the company should promptly investigate complaints (including those which may initially appear to be meritless). Failure to deal seriously with a complaint can significantly aggravate the problem and liability. Investigations of these concerns should be conducted by persons with training and experience, but also by persons who have the ability to be neutral and impartial (e.g. people with no connections to any of the parties involved in the complaint process).

Harassment is a form of discrimination that may consist of words, signs, jokes, pranks, intimidation, physical actions or violence that is directed at an employee due to any characteristic (these include age, race, religion, colour, national origin, sexual orientation, sex, disability). It includes offensive behaviour based on stereotypes about a protected class and behaviour that is intended to cause discomfort or humiliation because of a protected characteristic.

2.3. What is sexual harassment?

Sexual harassment is any behaviour, verbal or physical, of a sexual nature that has the purpose or produces the effect of violating the dignity of a person, particularly when creating an intimidating, degrading or offensive environment. Sexual harassment behaviours are classified into two types:

- Hostile environment based on sex is conduct that creates an intimidating, hostile, or humiliating work environment for the person who is the subject of it.
- Quid pro quo sexual harassment is produced by a hierarchical superior or persons whose decisions may have effects on the employment and working conditions of the harassed person.

There is a difference between these two terms that is important and interesting to point out. In quid pro quo sexual harassment, only active subjects can have the power to decide on the access and continuity of the harassed person or their working conditions (wages, promotion, access to benefits, etc.). In the first one, this hierarchical relationship is not necessary, i.e. it can be exercised by colleagues (of equal or lower level) or third parties (clientele, collaborators, suppliers) related to the workplace. Although in this case there is no direct impact of the act of harassment on the continuity of the person at the workplace or in their conditions, the degradation of the work environment has a negative impact on the motivation, health of working people, and generates a decrease in performance and absenteeism, or which is the same thing, the loss of productivity.

Quid pro quo sexual harassment can be explicit when there is a direct and explicit proposal of sexual request or physical coercion for it. Or implicit when the working person has not been sexually requested, but other persons of the same sex, in similar professional circumstances, improve their category or salary for accepting conditions of sexual blackmail, which implicitly encourages their acceptance. In hostile environment based on sex, the consequences are less direct; the determining factor is the maintenance of a behaviour or attitude of a sexual nature of any kind that produces a negative work environment for the working person, creating an offensive, humiliating, intimidating or hostile environment, which ends up interfering with their normal performance. What is negatively affected here is the environment of the workplace.

As noted above, harassment does not involve unique behaviour but includes a variety of situations, including:

- Jokes and comments about the appearance or sexual condition of the worker.
- Use of images, photographs or drawings of sexually explicit content.
- Communications (phone calls, emails, etc.) of sexual content and offensive character.
- Deliberate and unsolicited physical contact, or an excessive or unnecessary physical approach.
- Persistent invitations to participate in social activities, despite the fact that the person for whom they are intended has made it clear that they are not wanted.
- Invitations or requests for sexual favours if these are directly or indirectly related to the professional career, the improvement of working conditions or job retention.
- Behaviours that seek the humiliation of the worker for their sexual condition.
- Physical assaults of a sexual nature, such as rape, sexual assault, molestation or attempts to commit such assaults, and intentional physical conduct of a sexual nature, such as touching, pinching, patting, grabbing, brushing against another employee's body or poking another employee's body.
- Subjecting or threatening to subject an employee to unwanted sexual attention or unwanted sexual behaviour or intentionally making work more difficult because of the sex of the employee.
- Retaliation for sexual harassment complaints.

2.4. Bystander approach

According to A. Powell (2014), "a bystander is anybody who becomes aware a behaviour, or situation where sexual violence has the potential to occur, is occurring or has occurred". There

are two types of bystanders: active (which are those who intervene and take action in response to what they have just witnessed) and passive (which are those individuals who decide to not interfere in the situation at all).

In her study – and in many others – she states that many psychologists and social workers are trying to turn passive bystanders into active bystanders, as those who suffer sexual

harassment tend to feel more supported and braver to face a situation like this when at least one person in their environment shows that they are with them. For A. Powell (2014), as for many others, changing the role of the bystanders is crucial in order to tackle issues as difficult and harmful as sexual harassment.

2.5. Main causes of sexual harassment

The main causes of sexual harassment, listed in the majority of investigations and research done in this field, are (Inmark, 2006):

- Sexism: It is the discrimination of persons at the workplace. Women are the main group affected, but not the only ones in the work environment.
- Gender stereotypes: There are still perceptions and prejudices in our society that put certain people in a vulnerable situation due to the person's gender.
- Abuse of power: the perpetrator's use of their superiority or position in the company.
- Lack of ethics in interpersonal relationships: The harasser clearly shows selfishness and empathetic inability towards the person affected by these behaviours.
- Lack of labour regulations: Many companies do not have a strategy to prevent or deal with this kind of incidents. This facilitates the appearance of new harassment cases.
- Job insecurity: There is a connection between job instability and an increased number of sexual harassment cases. If there is more vulnerability, there is a higher possibility of harassment.

In that way, we can summarise that sexual harassment is **a form of violence that the perpetrator uses as an instrument to exercise power over the other person**. These acts are abusive behaviour. The sexual harassment that a supervisor inflicts on their employees is considered more severe than that between co-workers. Since the offender has the advantage of being the boss, in this case the situation of the person affected by these behaviours in the company depends on this person.

Therefore, we can say these two factors are the main contributors to the existence of sexual harassment in the work environment:

- a sexist work environment
- the abuse of power

2.6. People affected and their background

Sexual harassment can occur between men and women, between people with different sexual orientation, gender identity and transgender. Sexual harassment and harassment on the grounds of sex are a reflection of the social power relations between women and men, so their causes are related to the roles attributed to men and women in society, and as a consequence, it affects power relations at the workplace. As different studies show, the fact that women are mostly the object of these situations has to do with these power relations, in which they are perceived as subjects lacking power.

People with a lower employment status who are dependent on others are more at risk to be affected by sexual harassment than others. It is therefore not only a problem at individual level, but also at organisational level, to take measures to prevent the risk of sexual harassment at the workplace. Employees usually find it very difficult to make allegations about sexual harassment or discrimination. They worry about the consequences and the effect the complaint will have on others at the workplace. They may feel vulnerable and concerned about losing their job.

Thus, for example, the most frequent profile of the person affected by sexual harassment is not the young and attractive worker, but more often other features appear that indicate greater social vulnerability (Molano, R. C., 2009):

- Single women (single mothers, widows, separated, divorced) with family responsibilities.
- Women who join professional sectors or traditionally male categories and in which the presence of women is scarce.
- Young women who access their first job, usually temporary.

Other vulnerable profiles are homosexuals and, increasingly, immigrant women.

On a personal level, having personal strategies to face risky situations before harassment becomes a reality is a guarantee for the success of the preventive action. The goal of this intervention is to promote the individual ability to cope with the risk of harassment. Mental, physical and emotional well-being is essential for the individual to respond to being involved in

a harassment incident, and these therefore are factors that must be included in any training to help prevent people facing sexual harassment at the workplace:

- **Physical well-being** is very important to deal with stress. Some of the activities could be physical activities in the company to promote interpersonal relationships. Also important are good sleeping habits, a healthy diet to maintain a suitable physiological state, reducing the consumption of energy drinks that help avoiding inappropriate reactions and avoiding alcohol or drugs because they worsen the consequences.
- **Psychosocial well-being:** Establishing healthy social habits and learning how to interact with people in a positive way is essential. Some activities to achieve this wellbeing are i.ex.: focusing the attention on those aspects in personal life that bring satisfaction, avoiding being alone for long periods of time and implementing routines.
- **Psychoemotional well-being:** It focuses on recognizing and controlling stressful and repetitive thoughts. A number of useful techniques are considered in order to achieve the psychological and emotional well-being mentioned above. First, techniques that focus on thoughts are based on identifying distorted thoughts. These thoughts can be: self-blaming, magnification of mistakes and anticipating situations that have not happened yet. This results in psychological exhaustion for the person enduring these behaviours. One of the most commonly used techniques is based on the identification, analysis and replacement of problematic thoughts. Another is to change the task the moment a toxic thought is detected. Finally, physical and cognitive deactivation techniques are proposed. It is essential to deal with stressful and tense situations. There are two relaxation techniques: controlled breathing and muscle relaxation. In addition to their effect on the response to stress, these techniques are useful for training voluntary attention. In this way, the person concerned is able to focus his attention in the present and to face his problems with the necessary means.

2.7. Prevention: Strategies for reducing the exposure to the risk of sexual harassment

Employers legal responsibility

In relation to the labour regulatory compliance and human rights protection, the internal regulations in each country consider the obligation of companies to avoid any kind of discriminatory behaviour or harassment at the workplace. The face to face activities include a part of your specific country regulations. Ideally, the company should have a double responsibility: through action and omission. The first case is a consequence of active behaviour by the business owner. The second is a consequence of the business owner's inactivity to adopt measures in order to prevent harassment.

The Equality Plans and action protocols usually establish disciplinary sanctions like dismissal, suspension without pay, forced relocation without entitlement to compensation, shift change, forfeiture of promotion, etc. The company's lack of response towards a sexual harassment case may lead to sanctions depending on the severity of the case. They can also face the loss of support or supplements for a period of time.

European legislation

In Europe, diverse regulations are governing the companies' obligations in relation to the protection of their employees against all kinds of harassing behaviours. Sexual harassment in the work environment can be the cause for disciplinary dismissal for the perpetrator and a good reason for the person affected to request the termination of the employment contract. The European Parliament approved the 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)).

Implementation of structures for prevention

The aim of this training is to develop a system to ensure that the workplace is free from sexual harassment through the implementation of a method designed to stop any circumstance that may lead to it. Thus, according to this, any company should communicate their measures on zero tolerance for any forms of harassment, discrimination, bullying, or violence at the workplace.

Training

An effective way to achieve this is to not only focus on the employees but empowering the supervisors and give them the tools they need to identify warning signs and follow proper protocols for prevention.

The main objectives of the training are:

- Empowering employees to know what the signs of harassment are
- Promoting an active bystander approach
- Helping people address stereotypes
- Building an inclusive work environment:
 - Creating a culture of inclusion where everyone is valued
 - To build an inclusive culture, observe your team for small exclusions.
 - Training the supervisors; educating people in charge of this problem.

- Monitoring the workplace. Employees must report regularly to their employers on the working environment.
- All complaints or reports must be taken into account. If the complaint ends up being valid after the investigation, it must be answered promptly and effectively.
- Encouraging complaints or reports in case of harassment or discrimination.
- Encouraging employees to file a complaint or report.

Promote the right to complain

The right of the employees to complain about harassment, discrimination, and retaliation, and to whom such complains should be made have to be actively promoted in the organisation.

On the European level, the European Commission establishes measures to face and fight sexual harassment in the work environment (Solis, D. P., 2016):

- The employer must make a specific statement to prohibit and condemn sexual harassment ensuring the safety of the staff.
- A specific explanation to the staff about inappropriate behaviour and clear punishment measures.
- Explanation of the procedure to the person affected by the harassment, acting confidentially and providing protection during the process.
- Making sure that the staff is aware of the company's policy on sexual harassment.
- It is the employers and employees' responsibility to achieve a respectful work environment.
- Training the staff who is given specific tasks on this matter.
- Having specific protocols against harassment.
- Designating one person to provide advice and help.
- Including an article related to sexual harassment in the collective agreement.
- Encouraging complaints or reports in case of harassment or discrimination.
- Encouraging employees to file a complaint or report.

The planning of prevention in companies is essential to reduce or avoid this kind of behaviour. It is important to understand that just having the plan and communicating its existence is not enough, but it is a first and very important step in the fight against sexual harassment at the workplace. A first step is the declaration of principles or the commitment of the company. The management of the company makes a declaration of principles, negotiating with the staff

representatives. Said declaration must be public and must be spread by all means for all the employees to know it.

The second step is the elaboration of awareness and information campaigns. These campaigns must inform all the employees in the company about the different aspects of harassment. They can be carried out through talks, leaflets or any other means. Also, training activities must be put into action. It is essential that the company encourages training in the matter of equality. These actions are directed towards all staff. In the subject of occupational risk prevention, regardless of the size of the company, the employer must adopt both general and specific measures to prevent sexual harassment. Some of the preventive measures can be training activities, monitoring mental health, identifying psychosocial risks, etc. Apart from preventing sexual harassment, their goal is to create a working environment based on equality and respect.

Therefore, there are several steps organisations can implement to reduce the risk of sexual harassment occurring at their workplace:

- Developing a declaration of principles, indicating the commitment to the eradication of harassment and the defence of the right to dignity of working people.
- Disseminating a position of rejection of any form of discrimination based on sex, among which is sexual harassment, through the most widely used internal media.
- Developing codes of conduct and good practices.
- Facilitating information to the staff regarding the classification of behaviours that are considered to be sexual harassment and the penalties that it entails.
- Informing the channels and procedures provided for reporting harassment situations in the organisation.
- Carrying out training actions of which the objective and contents favour the development of attitudes open to equality between women and men, aimed at all the workforce and especially at senior management and middle management.
- Carrying out activities like conferences, advertising campaigns, etc. oriented to the formation and / or strengthening of attitudes favourable to equality between women and men.
- The inclusion in the collective agreement of rejection and penalty clauses for discriminatory behaviour based on sex and sexual harassment.
- The incorporation of the protocol of action in situations of harassment in the articles of the collective agreement.

- Development of information campaigns among the staff.
- The incorporation of content related to equality and prevention of harassment in the training activities developed by trade union organisations.
- The development of activities promoting equality and a work environment that respects the dignity of working people.

Keep in mind that:

- The employee who is harassing another employee can be an individual of the same sex. Sexual harassment does not imply that the perpetrator is of the opposite sex.
- The harasser can be the employee's supervisor, manager, customer, co-worker, supplier, colleague of the supplier. Any individual who is connected to the employee's work environment can be accused of sexual harassment.

The person affected by sexual harassment is not just the employee who is the target of the harassment. Other employees who observe or learn about sexual harassment can also be affected and institute charges. Anyone who is affected by the conduct can potentially complain of sexual harassment.

2.8. Instalment of an effective complaint or grievance process

The most advisable way of approaching the treatment of harassment situations is the elaboration of a protocol that includes at least information related to:

- the positioning of the organisation against harassment
- concept and typification of harassment
- human, technical and material resources
- complaint powers
- precautionary measures
- informal procedures
- formal procedures
- disciplinary and sanctioning regime

In big organisations, the grievance process can be even led by a grievance committee, consisting of different members of the organisation. In case that one member of the committee is accused, he/she has to be replaced. Before a complaint is even filed, the management has to assure that all employees are informed on the organisation's policy related to sexual

harassment. That it will not be tolerated, it will be investigated. Management shall also provide different ways in which an employee can make a formal charge or complaint. Complaints to the manager or supervisor should not be the only option as this may be the individual about whom the employee needs to complain.

Assign a staff member to be in charge of the complaint. This individual should be familiar with the organisation, the people in the organisation, and its history. A plan that covers the important people and situations to investigate shall be drawn up from the initial complaint. The investigation has to be planned on current knowledge. It has to be assured that the employee complaining is safe from retaliation. In the case of retaliation or ongoing harassment, the allegation has to be reported immediately to the investigating body.

For the treatment of investigations, it is necessary to define the technical and economic human resources that are available to the organisation to act in these cases. In the first place, it is necessary to establish which people are going to carry out the work of support, advice and investigation of complaints. For this, a team can be set up in which the organisation's management and the legal representation of workers are represented, and that is responsible for the following functions:

- reception of complaints
- carrying out the relevant investigation
- recommending and managing the precautionary measures before the human resources department
- Developing a report with the research findings
- When appropriate, urging the management of the organisation to open disciplinary proceedings, informing of the sanctions imposed.
- Supervising effective compliance with sanctions.
- Ensuring the guarantees of the action protocol.

It is advisable to set up complaint channels other than those commonly used for other labour relations problems, as these should in most cases be addressed to the immediate superior, which may incriminate the person concerned, or they may be people of different sex, which can inhibit the person suffering from these kind of behaviours. It is important to ensure that the procedures have the guarantees to maintain the confidentiality of the investigations carried out on the occasion of the complaint, as well as the privacy of the people throughout the process. Informal procedures should be incorporated into the protocol for a first approach to solving the problem, as well as a formal procedure that would lead to an investigation of the facts.

The following table outlines the responsibilities in several institutional bodies (depending on the size of the organisation) for compliance with this policy that would differ from those commonly used for other labour relations problems:

Responsible Party	Responsibility
Operations Managers, Deputy Operations Managers	<ul style="list-style-type: none"> - Ensure compliance with this policy. - Ensure that all employees are informed of the Sexual Harassment Prevention Policy and have completed the required annual training.
Organisations President or Designee	<ul style="list-style-type: none"> - Overall responsibility and authority for their location's efforts to comply with the Sexual Harassment Prevention Policy.
All Employees	<ul style="list-style-type: none"> - All employees are required to conduct their work in a manner that prevents sexual harassment at the workplace. - Report incidents of sexual harassment in accordance with the "Reporting Sexual Harassment" section above.
Supervisors and Managers	<ul style="list-style-type: none"> - Report complaints of sexual harassment, observations of any sexually harassing behaviour, or suspicions that sexual harassment is occurring in accordance with the "Reporting Sexual Harassment" section above.
Organisations Human Resources Office	<ul style="list-style-type: none"> - Ensure compliance with this policy. Daily responsibility and authority for the location's efforts regarding sexual harassment prevention and compliance with this policy. - Notify Central Office of sexual harassment complaints. - Assist in investigating sexual harassment complaints involving RF* employees or representatives.
Central HR	<ul style="list-style-type: none"> - Maintain corporate policy. Provide guidance on all aspects of the policy including conducting investigations. - Provide a training solution for all employees and supervisors at all locations.

<p>Central Office of Compliance Services</p>	<ul style="list-style-type: none"> - Assist in conducting investigations of sexual harassment reported to the Office of Compliance Services or received through the RF's Ethics Hotline. - Investigate allegations of sexual assault pursuant to Fraud and Whistleblower Policy.
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Figure 2 Responsible persons and responsibilities. The State University of New York Research Foundation, 2019.

SUNY RF (The State University of New York Research Foundation) is a community that offers expertise and guidance in topics such as ethics, risk management, internal controls and other areas. The staff coordinates corporate-wide policy and procedure development and training related to such activities as conflicts of interest, investigations, effort reporting, cost transfers, and export controls. The Research Foundation’s Ethics Hotline serves to maintain an ethical, professional, and law-abiding work environment, providing a simple, anonymous way to confidentially report activities that may involve improper conduct or violations of RF policies, procedures and processes.

Complaint Resolution Procedures:

- To ensure the prompt and thorough investigation of a sexual harassment complaint, the following information is needed:
- The name, department and position of the person allegedly committing harassment.
- A description of the incident(s) including the date(s), location(s), and the presence of any witnesses.
- The effect of the incident(s) on the complainant’s ability to perform his or her job, or on other terms or conditions of his or her employment.
- The names of other individuals who might have been subject to the same or similar harassment.
- What steps, if any, the complainant has taken to try to stop the harassment
- Any other information the complainant believes to be relevant to the harassment complaint.

Steps to be taken are:

- Determination of the appropriate scope of the investigation.
- Choose an investigator who has good people skills and judgment. Both will be important in almost every investigation. If you do not have a qualified neutral candidate inside, hire an experienced one from outside.

Assure the complaining party from the outset that the complaint will be treated

seriously, that there will be no retaliation for having raised the complaint, and that any concerns about retaliation should be brought to the investigator's attention immediately so that they can be addressed.

- The investigator needs to keep an open mind when gathering and reviewing information and has to refrain from concluding until all relevant data has been reviewed and assessed.
- Encourage all parties involved to maintain the confidentiality needed for a thoughtful investigation while avoiding heavy-handed mandates. All complaints and investigations are treated confidentially to the extent possible and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation and the HR director takes adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to a sexual harassment complaint or investigation is maintained in secure files within the HR department.
- Interviews with the complaining party (it is recommendable to ask the employee to tell the whole story in his own words. This should be listened to carefully, notes should be taken to document the conversation thoroughly).
- Interviews with the accused employee (employees who violate this policy are subject to appropriate discipline).
- Interviews with other employees and third parties (contractors, outside witnesses, etc.) who may have relevant information.
- Reviews of emails, memos, and other relevant communications.
- Consideration of how to resolve credibility in assessing conflicting reports.
- Assessment of whether the initial scope of the investigation needs to be broadened
- Taking action to address the concerns raised.
- Consider asking the complainant at the conclusion of the interview what he or she hopes will happen as a result of the investigation (one option: "How would you like to see the situation resolved?"). The company is not required to comply with unreasonable demands, but some requests (for example, a transfer, additional training, time off) may be helpful in resolving the concerns constructively.

- Investigations may take its time. If the employer cannot take immediate actions, depending on the circumstances the following steps may help to deescalate the situation:
 - Placing the alleged wrongdoer on paid or unpaid leave, pending the outcome of the investigation;
 - Allowing the complainant paid time off during the investigation.
 - Altering work assignments so that an alleged harasser does not work directly with or supervise the complainant.
 - Ensuring that all supervisors understand that retaliation will not be allowed.
- If an investigation results in a finding that this policy has been violated, the mandatory minimum disciplinary action is a written reprimand. The disciplinary action for very serious or repeated violations is the termination of employment. Persons who violate this policy may also be subject to civil damages or criminal penalties.

The person accused has to be informed that a complaint has been filed and that no acts of retaliation or unethical actions will be tolerated, and the accused person must also be asked to be patient while the investigation is conducted. The company must assure that person that a fair and just investigation will be conducted both on their behalf as well as on behalf of the accuser and that all potential witnesses will be interviewed in the same manner. Open questions shall be asked and facts sought that support or disapprove the employee's allegations. When talking to the accused person, behave in the same manner of listening and respecting as you did with the person who made the complaint. (Rosco, R. R., 2017) The company must consult with a lawyer to ensure that they fairly assess the overall situation based on the evidence available to them and ensure that the lawyer supports the direction the company is taking. Based on all of the documentation and advice received, the company has to make decisions about whether sexual harassment occurred or not. Then, the company should provide the appropriate disciplinary action to the appropriate people, based on their own findings; and recognise that no situation can be perfectly investigated. Even when harassment may have occurred, and the company believes it may have occurred, they may not have any facts or witnesses to support a complaint. (Rosco, R. R., 2017) The company and the person that is investigating the case have to assure that no further incidents occur by following up and documenting them with the employee who made the original harassment claim. They should keep the documentation separate from the personnel file and give the employee, who may have been wrongly accused, the same courtesy in follow-up and documentation. Adjust working situations fairly, where this is necessary for the comfort and productivity of all. (Rosco, R. R., 2017)

To consider:

- The employer wants to avoid any possibility or appearance that the employee's complaint was disregarded. So it is recommended to respond immediately.
- Ethically, the employer will not want to allow such behaviour to exist at the workplace.
- The trust, morale, and fair treatment of employees are at stake. An employer's actions send powerful signals about what another employee can expect in similar circumstances.

In all cases, make sure that you write accurate documentation and keep it complete. Employees who are unhappy with the results of your investigation may take additional legal action.

Why may complaints be a serious problem for organisations and why is the prevention of sexual harassment in their interest? Questions to be posed to assess the impact:

- Is the claim a one-off allegation or are there more claims that can and probably will be made?
- Does the claim reflect a cultural problem at the company? If so, how should it be addressed? Would the training be helpful?
- How will third parties – including customers, recruits, and vendors – react if the claim becomes public?
- Is it best to attempt a quick settlement with the complainant on reasonable terms? If that occurs, will that solve all issues?
- If the matter heads to litigation or arbitration, what legal fees and costs are expected to be incurred?
- Were any executive officers aware of ongoing harassment or discrimination and did they fail to act? How should such failings be addressed?

2.9. Action Plan: How to take immediate and appropriate action in case of a complaint

The person who has suffered the sexual assault has the right to submit a complaint or claim in the company to the manager or supervisor. However, this usually does not happen because the person being harassed feels guilty or is afraid of retaliation. Therefore, it is really important that there are certain people in the company that act as mediators to encourage the resolution of conflicts inside the company. (Colectiva, S. G., 2015)

These people must have the adequate training in order to deal with these conflicts and can be part of the department directors, those responsible for the employees, or the representatives in Occupational Risks Prevention (Colectiva, S. G., 2015). Said complaint must have a minimum content: identification of the person who is being harassed, the perpetrator and the person reporting it, description of the events and identifying the witnesses.

So we can summarise as follows:

- Professional approach in the case of sexual harassment at the workplace.
- Development of an effective complaint mechanism or grievance system in the organisation.
- Training employees. Teaching the employees to identify the sexual harassment behaviours, offering them a complaint procedure and motivate them to use it.

All complaints or reports must be taken into account. If the complaint ends up being valid after the investigation, it must be answered promptly and effectively.

When that person has already filed the complaint or report, the company owner must decide which measures to take. In any case, they are obliged to conduct investigations even if there are only rumours. This might include:

- Hearing gossip from other employees.
- Non-involved employees or friends of the targeted employee bring up the subject to help the co-worker.
- Any instance in which an employee tells about questionable behaviour that they have witnessed.

There are several types of procedures to respond to these complaints or reports (Miller, C. C., 2017).

- First of all, there is an informal procedure. It is initiated when a person in the group which was created to process the complaints becomes aware of a harassment case verbally. This information can originate from the person who suffers from these behaviours or another person in the staff. A person will be appointed to oversee the investigation and, in one week, the procedure will be applied, proposing measures that are considered necessary. This procedure will be classified as urgent and confidential. The result of the investigation will also be confidential, and only the commission established to carry out the process will have access to it.
- On the other hand, there is a formal procedure. This kind of procedure requires a written complaint or a previous informal procedure in order to be started. Said complaint is

forwarded to the created commission to take care of these records. This procedure is started with a pre-trial phase and is finished with the preparation of a conclusions report. The procedure must be fast to try to minimise the consequences of the exposure of the person to these behaviours. Like in the previous case, the process must be confidential.

During the development of these procedures, a certain number of principles must be maintained and respected: urgency, confidentiality, privacy, dignity and legal certainty, impartiality, and defence of those involved.

2.9.1. Responding to a reported sexual harassment in different roles:

Employees:

Step 1: if an employee feels that he or she is being subjected to sexual harassment, he or she may immediately inform the harasser that the conduct is unwelcome and needs to stop. Step 2: If the inappropriate conduct does not stop, or if the employee is unable or uncomfortable to address the alleged harasser directly, he or she should report the incident to his or her own supervisor or to the human resource director. A written record of the date, time and nature of the incident(s) and the names of witnesses could be helpful but not mandatory. It is important to report all concerns of sexual harassment as soon as possible, to make the management aware of the situation so that an immediate and impartial investigation can be conducted and appropriate action to prevent the prohibited conduct can be taken.

Managers and supervisors:

Step 1: They shall act expeditiously and impartially when they get to know of sexual harassment within their organisations and departments, whether or not there has been a written or formal complaint.

Step 2. They have to take all complaints and concerns of alleged or possible harassment seriously, no matter how minor or who is involved.

Step 3: They have to report all incidents to their superiors (e.g. HR department, CEO...) immediately so that an immediate investigation can be conducted.

Step 4: They have to take appropriate measures to prevent the recurrence of retaliation or prohibited conduct during and after investigations or complaints.

Managers or superiors who knowingly allow or tolerate sexual harassment or retaliation, including the failure to immediately report such misconduct to their superiors, are in violation of this policy and subject to discipline.

Human resources:

Step 1: They have to ensure that both the person filing the complaint and the accused person are aware of the seriousness of a sexual harassment complaint.

Step 2: Explaining the company's sexual harassment policy and investigation structures to all parties involved.

Step 3: Exploring informal means of resolving sexual harassment complaints.

Step 4: Notifying the police if criminal activities are alleged.

Step 5: Arranging for an investigation of the alleged harassment and the preparation of a written report.

Step 6: Submitting a written report summarising the results of the investigation and making a recommendation to designated company officials

Step 7: Notifying the complainant and the respondent of the corrective actions to be taken, if any, and administering those actions.

The HR director determines if an in-house investigation has to be conducted or if a third party has to be contracted to complete the investigation. All complaints involving senior management at the vice-president level or above are handled by an external third party.

Depending on whether there are formal procedures or active measures, the following cases may occur:

- The conflict is solved as the harassing behaviour is concluded. The solutions can range from a warning to more relevant disciplinary measures.
- The dismissal of the harassment perpetrator through a disciplinary dismissal. Other sanctions such as suspension from duties without pay or forced relocation can also be applied, depending on the national laws.
- The person being harassed requests a contract resolution of their own free will, following the right of protection and the breach of the worker's health and moral protection.

This happens when medical or psychological treatment is required for the person being harassed as a result of the harassment. This is the reason why, during the invalidity procedure, harassment is required to be considered as an illness or an accident at work.

Besides that, workers can report the incident to the administrative body that deals with workers' rights and safety at the workplace. The company may be punished with this method. Finally, the person who is being harassed can file a claim before the Labour Court, since sexual

harassment goes against the fundamental rights and freedoms and it may entail a crime against the integrity of a person.

2.10. Support providers and further help

2.10.1. Lithuania

Equal Opportunities Ombudsperson is the main support system in Lithuania in case of sexual harassment incidents. Each person shall have the right to file a complaint with the Equal Opportunities Ombudsperson concerning a violation of equal rights, therefore the Ombudsperson accepts complaints about any type of harassment or discrimination. The complaints shall be submitted in writing. The complainant or an authorised representative can file a complaint with the Equal Opportunities Ombudsperson by post, email, filling in the electronic complaint form or delivering the written complaint directly to the registry of the Office of the Equal Opportunities Ombudsperson. More information: <https://lygybe.lt/en/>

2.10.2. Turkey

There is a growing number of organisations and institutions at the national level in Turkey which take initiative to prevent sexual harassment in a general sense. Some of them also have a specific approach and methodology to prevent sexual harassment cases at the workplaces. These organisations and institutions can be listed as follows:

- Women NGOs with the aim of supporting women' status in the labour market to increase their contribution to the national economy or with a focus on economic empowerment of women who are at risk of social exclusion. Also, a counselling and research centre, providing psychological support for the affected persons who are exposed to different kinds of violence or harassment.
- Social assistance and solidarity foundation providing financial aid and support (women who are out of the labour market because of their responsibilities in the family or as a result of being exposed to harassment or violence can apply to this foundation for financial support)
- Violence Prevention and Monitoring Centers (ŞÖNİM) which operate on a 7/24 basis and provide support and monitoring services in order to prevent the violence and to carry out the protective and preventive measures efficiently.

Moreover, there is a 24-hour violence hotline (ALO 183) that is available for people who have experienced or are at risk of all forms of violence (family and domestic violence and/or sexual harassment).

2.10.3. Spain

The list of stakeholders available for those who are working in this field includes several national organisations that range from specific associations against harassment towards women at work, like the Asociación española contra el acoso laboral y la violencia en el ámbito familiar, to more generic associations that try to prevent and solve cases of workplace harassment, like the COSMI (Centro de Orientación SocioLaboral). Regarding their scope, these associations also reach various different options, from unions and non-profit associations to ministries and town councils. The common point shared by all of these associations is their concern about any conflict that may arise at the workplace, also taking into account organisations that focus on specific groups of workers as well as specific fields and environments such as LGBT+ communities or agricultural workers.

2.10.4. Bulgaria

GAF - Bulgaria believes that state institutions are the primary stakeholders, but also the first organisations to introduce rules to combat sexual harassment at the workplace and set standards to be followed by other sectors. That is why we are actively working with representatives of the judiciary, such as the Plovdiv District Court, the Smolyan District Court, the Asenovgrad District Court, the Kardzhali District Court and others with which our organisation has partnered for years. At the same time, under Bulgarian conditions, an extensive office of the Bulgarian prosecutor's office is located in each city with a local court. Prosecutors are an important part of the fight against sexual harassment at the workplace because any internal system of complaints about harassment at the workplace must be able to end with the intervention and protection of the government from outside. Prosecutors are precisely the instruments that will actively assist the affected person to defend themselves through the judicial system if the internal capabilities of the organisation are exhausted.

Equally important stakeholders for us are police officers. They belong to the public authorities where people who have experienced sexual harassment will turn to. For example, if the employer could not help them and the bullying has turned into violence. We partner with two of the largest universities in Bulgaria - Sofia University "Kliment Ohridski" and Plovdiv University "Paisii Hilendarski". We are also close partners with one of the largest banks, which also employs several thousand employees. This is DSK Bank, which is part of the OTP Group. Last but not least, we are actively partnering with the local structure of the Bulgarian Anti-Discrimination Commission.

2.10.5. Austria

From the perspective of organisations, the Chamber of Commerce is throughout Austria the main provider of information and advice in case of sexual harassment as it is the representation of interests of commercial business. Some big organisations (private and public) already implemented a department for equal treatment like the Tirol Kliniken GmbH, which is the biggest hospital provider in Tyrol, or the Austrian railway services. At the moment there is no independent institution in place, which advises organisations on how to prevent sexual harassment or how to deal best with sexual harassment at the workplace.

From an individual level, there are three main organisations, which are working for the interests of employees. First, the Austrian Chamber of Labour operates as the statutory representative of the interests of employees. The Trade Union Federation is the second provider to represent the interests of employees. For more than 20 years the Austrian Ombud for Equal Treatment as a public institution is already in existence to support with legal advice against racism and discrimination including sexual harassment at the workplace. Furthermore, there are a couple of private organisations like ZARA, which is an association for civil courage and anti-discrimination work, women's shelters to offer women and their children help, counselling and temporary sheltered accommodations, Caritas as well as Diakonie in an ecclesiastical context.

3. TRAINING DESIGN PLUS TOOLBOX

Recommendations for implementing Be Aware training:

- For effective results, the Be Aware Project suggests not to do training with less than 6 and not more than 15 people.
- Location: it is suggested to hold the training in a space where tables and chairs can be moved as some exercises require that. It is recommended to have enough space to move in the room in general.
- Technical equipment: Be Aware training exercises require to have a projector for slides or videos which will be used during the training. It is also highly recommended to have flipcharts or at least A3/A2 size paper sheets and a place to constantly hang them for the exercises.
- It is recommended to negotiate with the CEO/another representative of the venue if lunch, snacks or drinks can be provided.

The Be Aware Project suggests a given lesson plan as an option and primary recommendation, but it is up to the trainer to shift or change any given timings or sequence of exercises if he/she requires so.

Timing	Training	Content	Timing (in minutes)	Comments
DAY 1				
9:00-9:50	Introduction to the training	Body contact – My comfort zone	25min	Warm-up exercise to engage participants in the topic
		Sexual harassment as abuse of power	25min	Theory input
9:50-11:20	A world without sexual harassment	Group reflection about the impact and influence of sexual harassment on work. Why does it matter?	90min	Group reflection with discussions and personal experiences
BREAK				
10:50-11:50	Sensitisation	Ways to identify sexual harassment at the workplace	120min	Video analysis
11:50-12:50	Sensitisation	Analysis of case studies to see if it's sexual harassment or not	60min	Analysis of case studies
LUNCH BREAK				
14:30-16:30	Prevention	How to reduce the exposure to sexual harassment in your organisation. Development of steps to be taken within your own organisation.	120min	Reflection, planning unit in small groups & discussion

16:30-16:45	BREAK			
16:45-17:45	Prevention	How to prepare a prevention policy for your organisation	50min	Draft a prevention policy which you might present and discuss with the principles of your organisation – work in small groups
DAY 2				
9:00-11:00	Prevention	How to negotiate this strategy with your principles, how to implement it in the organisation and to promote it within the staff	120min	Individual reflection and feedback in the plenum
11:00-11:20	BREAK			
11:20-13:20	Complaint and grievance plan	Developing a formal and detailed complaint model for sexual harassment for your organisation	120min	Group work to develop the plan including responsibilities and procedures. Presentation in the forum for exchange of best practices.
13:30-14:30	LUNCH BREAK			
14:30-16:30	Action plan in case of complaint	How to take immediate and appropriate action in case of a complaint. Step-by-step model including complaint resolution processes.	120min	Group work to develop the action plan. At the end, each participant shall have an action plan suiting for his/her organisation which can be presented in the organisation.
16:30-16:45	BREAK			
16:45-18:00	Capacity building	Responding to reported sexual harassment in different roles	75min	Role playing
Total – 16 hours				

Exercise Nr. 1	Name	Body contact – My comfort zone
Aim of the exercise	Participants will get in touch with the topic and establish the base of it, so the training can start from somewhere.	
Description	<p>Participants are asked to find a partner in the group whom they do not know; then they should try to get as close to the person as they think they still feel comfortable with. Check if this is the same distance for both partners or if they have a different perception of an adequate distance.</p> <p>After sharing in pairs, share observations with the whole group and discuss what might affect might influence the appropriate physical contact for each person.</p>	
Timing	25 minutes	
Resources and materials	Space for the group to work	
Steps for performing the task	<ol style="list-style-type: none"> 1. Put participants in front of each other. 2. Ask one of them to walk up to the other person and stop whenever they feel comfortable. 3. Then do the same with the other person. 4. Analyse the distance, see if it is the same for both participants involved. 5. Discuss the results. 	
Exercise Nr. 2	Name	Sexual harassment as abuse of power
Aim of the exercise	Participants will understand the core of sexual harassment and its roots, so they can better understand tackle it.	
Description	<p>To go beyond the gender discussion in this issue, it might be helpful to talk about the abuse of power in situations of sexual harassment. This might help the whole group to have a common goal. Most people do not tolerate the abuse of power and they understand that human rights and the rights of equality have to be defended.</p> <p>This might help you to work on the topic more efficiently than ending up defending yourself and the training.</p> <p>Ask people for examples of abuse of power, why this should not be tolerated and how they would assure to stop this.</p>	
Timing	25 minutes	
Resources and materials	N/A	
Steps for performing the task	N/A	
Exercise Nr. 3	Name	A world without sexual harassment

Aim of the exercise	Participants will share their knowledge and opinions about the impact of sexual harassment in the workplace.	
Description	Group reflection about the impact and influence of sexual harassment in the workplace. Question for the debate: Why does it matter?	
Timing	50 minutes	
Resources and materials	Space for the group to work and discussion. Maybe flipchart to write down the main ideas of the group.	
Steps for performing the task	<ol style="list-style-type: none"> 1. Ask participants for their opinion on the topic. 2. Let them discuss and debate about it. 3. Once they are finished, go over the main ideas. 	
Exercise Nr. 4	Name	Sensitisation
Aim of the exercise	To discover ways to identify behaviours that can be categorised as sexual harassment at the workplace.	
Description	Participants are given different situations where sexual harassment may be present, and they have to analyse these situations to see if they can be classified as sexual harassment or not and give reasons for it.	
Timing	120 minutes	
Resources and materials	<p>Paper on which the different cases are written down so participants can take their time to analyse each situation and present their arguments. Template for participants:</p> <p>Are the following situations cases of sexual harassment at work?</p> <ul style="list-style-type: none"> • A manager implies to a lower-ranked person that they should have intimate relationships in order to keep the job. • A co-worker says to another that they look very handsome in a photo that they showed them. • An administrator makes mean comments about female clients to his co-workers. • An employee of an architecture firm is being made uncomfortable by the office partners who usually tell sexually explicit jokes. • A nurse is repeatedly fondled by a nursing assistant without consent. • A secretary sends emails to co-workers that contain jokes. • A supplier tells the manager of a company with which she collaborates that 	

	agreeing to have a date with her will bring him many professional and personal advantages	
Steps for performing the task	<ol style="list-style-type: none"> 1. Show participants different situations that display behaviour that can be categorised as sexual harassment. 2. Ask them whether or not they would describe these particular behaviours as sexual harassment and ask them to explain the reasons for it. 3. Discuss their findings with the whole group. 	
Exercise Nr. 5	Name	Sensitisation
Aim of the exercise	The aim is to find ways to identify behaviours that can be categorised as sexual harassment at the workplace.	
Description	Analysis of case studies to see if it is sexual harassment or not, based on the previous exercise.	
Timing	60 minutes	
Resources and materials	<p>Case studies in which risky situations are presented. Sheets of paper on which the participants write their analysis.</p> <p>Template:</p> <p>A is a young woman who works in a consultancy. One day she meets with B, a senior manager of an important company in the country. When the meeting ends, A turns on her mobile phone and sees that B has been sending her sexual messages during their meeting.</p> <p>Question 1. It is sexual harassment, because B is a client of A, even if they do not work in the same company. True or False?</p> <p>TRUE: Sexual harassment at the workplace can be carried out by persons who are related to the employee because of their connection to the company, as is the case with customers.</p> <p>Question 2. Sexual harassment is not only physical harassment, but it is also considered to be such when it is committed with words. True or false?</p> <p>TRUE: Sexual harassment at the workplace can also occur through communications (telephone calls, e-mails, etc.) with sexual content and of an offensive nature.</p> <p>Question 3. B should be advised to stop making these comments, even if it is not such a big deal. True or false?</p> <p>TRUE: B's behaviour towards A is very serious and it is disrespectful towards a worker. B must behave respectfully and not cause A to feel uncomfortable while doing her job. A does not have to endure this bad work experience and must inform her superiors or the appropriate person so that B is disciplined or any employment relationship with him is terminated.</p>	

Steps for performing the task	<ol style="list-style-type: none"> 1. Give the participants different case studies. 2. Ask them to analyse them and determine whether it is true or false that these are situations in which sexual harassment is occurring. 3. Discuss their findings with the whole group. 	
Exercise Nr. 6	Name	How to reduce the exposure to sexual harassment in your organisation
Aim of the exercise	Participants will learn new ways to reduce the risk of exposure to sexual harassment in their own organisations, with the aim of totally eradicating this kind of behaviour.	
Description	<ul style="list-style-type: none"> - To find out if the climate of the company is free of sexual harassment behaviour we will answer these questions: - Has an equality plan already been developed and implemented in my organisation? - Do I know and apply the legal regulation and the collective agreement in my company in connection with sexual harassment? Do the people in charge of the company and the entire staff know it? - Have any specific measures been implemented against sexual harassment in my company that deviate from the provisions of the collective agreement or that imply an improvement to what is established by law or collective agreement? Have these measures been negotiated with the legal representation of the workforce? - If yes, have they been evaluated or are they reviewed and updated periodically? Since when have they not been reviewed? - Do we have occupational health or occupational risk prevention measures specifically aimed at preventing sexual harassment? - Is there any person in my company responsible for the procedures of action and prevention against sexual harassment? And of its monitoring and evaluation? - Has the organisation provided training on equal treatment and equal opportunities for women and men? Does it include content on gender-based violence, sexual harassment and gender-related harassment and its psychosocial and health effects? - Has any type of study or survey been carried out to detect possible actions and/or situations of harassment? - What are my own conclusions? 	
Timing	120 minutes	
Resources and materials	<p>Give participants the following list of examples:</p> <ul style="list-style-type: none"> - Developing a declaration of principles, indicating your commitment to the eradication of harassment and the defence of the right to dignity of working people. - Disseminating a position of rejection of all forms of discrimination based on sex, which includes sexual harassment, through the most widely used internal media. - Developing codes of conduct and good practices. 	

	<ul style="list-style-type: none"> - Facilitating information to the staff regarding the classification of behaviours that are considered sexual harassment and the associated penalties. - Information on the channels and procedures for reporting harassment situations within the organisation - Carrying out training actions, the aim and content of which are conducive to the development of attitudes open to equality between women and men and aimed at the entire workforce and in particular at senior and middle management. - Carrying out activities like conferences, advertising campaigns, etc. aimed at the formation and/or strengthening of attitudes favourable to equality between women and men. - The inclusion of rejection and sanctioning clauses for discriminatory behaviour based on sex and sexual harassment in the collective agreement. - The incorporation of the protocol of action in situations of harassment in the articles of the collective agreement. - Development of informative actions among the staff. - The incorporation of content related to equality and prevention of harassment in the training activities developed by trade union organisations. - The development of activities promoting equality and a work environment that respects the dignity of working people. 	
<p>Steps for performing the task</p>	<ol style="list-style-type: none"> 1. Present participants the following list of examples to show which steps might help to reduce the risk of being exposed to sexual harassment. 2. Explain the individual points to them. 3. Ask them to think about their own organisation and to create a list on how to reduce the risk in their own organisation. 	
<p>Exercise Nr. 7</p>	<p>Name</p>	<p>Prevention</p>
<p>Aim of the exercise</p>	<p>Learn how to prepare a prevention policy for your organisation</p>	
<p>Description</p>	<p>Participants will have to draft a prevention policy, which they might present and discuss with the principles of the organisation. They will work in small groups.</p>	

Timing	50 minutes	
Resources and materials	flipchart for each group, sheets of paper, markers	
Steps for performing the task	Let the participants discuss and brainstorm about a strategy.	
Exercise Nr. 8	Name	Prevention
Aim of the exercise	Learn how to negotiate this strategy with your principles, how to implement it in the organisation and to promote it within the staff	
Description	Participants will go back to the previous activity and find ways to present the strategy to their bosses and managers. They will also find ways to implement the strategy properly in the organisation and find ways to promote it among the staff of the company.	
Timing	120 minutes	
Resources and materials	flipchart for each group, sheets of paper, markers	
Steps for performing the task	Let the participants discuss and brainstorm on how to present and implement the strategy.	
Exercise Nr. 9	Name	Complaint and grievance plan
Aim of the exercise	Developing a formal and detailed complaint model for sexual harassment for the participants' organisations	
Description	Present participants the following list of examples of steps that might help to formulate a complaint model. Explain the individual points to them. Then ask them to think about their own organisation and to create a model for their own organisation. What other steps could be helpful in the implementation?	
Timing	120 minutes	

<p>Resources and materials</p>	<p>The most advisable way of addressing harassment situations is to draw up a protocol containing at least information about the harassment:</p> <ul style="list-style-type: none"> ▪ positioning of the organisation against harassment ▪ concept and typification of harassment ▪ human, technical and material resources ▪ complaint powers ▪ preventive measures ▪ informal procedures ▪ formal procedures ▪ disciplinary and sanctioning regime 	
<p>Steps for performing the task</p>	<ol style="list-style-type: none"> 1. Present participants the following list of examples of steps that might help to formulate a complaint model. 2. Explain the individual points to them. 3. Then ask them to think about their own organisation and to create a model for their own organisation. 	
<p>Exercise Nr. 10</p>	<p>Name</p>	<p>Action plan in case of a complaint</p>
<p>Aim of the exercise</p>	<p>Get the participants involved in the situation by using role playing</p>	
<p>Description</p>	<p>How to take immediate and appropriate action in case of a complaint. Step-by-step model including complaint resolution processes; group work to develop the action plan. At the end, each participant shall have an action plan suitable for his/her organisation which can be presented in the organisation.</p>	
<p>Timing</p>	<p>120 minutes</p>	
<p>Resources and materials</p>	<p>N/A</p>	
<p>Steps for performing the task</p>	<p>Have the participants choose a situation where sexual harassment is present (or give them one if they cannot find such a situation) and ask them to perform a little play about it, where the audience (other groups) can see how the different parts involved react to this situation.</p>	

4. Annex I: Template in case of complaint

1. Could you please state your name and surname?
2. Could you state the name of your harasser?
3. Could you describe the action/behaviour by which you felt attacked?
4. Have these behaviours happened more than once?
5. Have they always happened in the workplace? Has your harasser ever tried to approach you outside the working environment?
6. Where did the event/s happen?
7. Has anyone else seen these behaviours? Are there any witnesses?
8. Would you like to get some information on psychological help that may be at your disposal?
9. Would you like to report this matter to the police?
10. Was our help useful and enough?

5. Annex II: Evaluation Questionnaires

5.1. FTF Training Course Pre-Evaluation

Please, fill in this questionnaire before starting the training course:

1. Do you know what sexual harassment is? Could you give your own definition?
2. Do you know any data about sexual harassment at the workplace in your country?
3. And in general?
4. Do you know any measures to prevent sexual harassment from happening in the workplace? If so, are they currently being applied at your workplace?
5. Have you ever developed a complaint and grievance plan?
6. What are the steps you would follow to develop one?

5.2. FTF Training Course Mid-Evaluation

Please, fill in this questionnaire after the first session of the training course:

1. Have you acquired any new knowledge during this first session?

2. Would you say you are more capable now to recognise sexual harassment than before starting this training course?
3. Would you say you have tools that allow you to prevent these behaviours from happening at the workplace?
4. Have you learned new techniques that could be used as a way of preventing sexual harassment at the workplace?
5. Do you think that you are now able to develop a prevention strategy in your company?

5.3. FTF Training Course Final Evaluation

Please, fill in this questionnaire after completing the training course:

1. Have you acquired any new knowledge during this training course?
2. Would you say you are more sensitive now to sexual harassment in general?
3. And to sexual harassment at the workplace?
4. Would you say you are now capable to present a strategy to your supervisors in order for this to be applied in the company?
5. Would you say you are able to develop a detailed complaint model for sexual harassment for your organisation?
6. Would you say you are able to take immediate and appropriate action in case of having a complaint in your organisation?
7. Would you say you know how to appropriately respond to a case of sexual harassment?
8. Was this training course useful for you in terms of applying new techniques to your organisation?
9. Do you think you could use this new knowledge for your working environment?
10. Would you recommend this training course to other colleagues or supervisors?

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