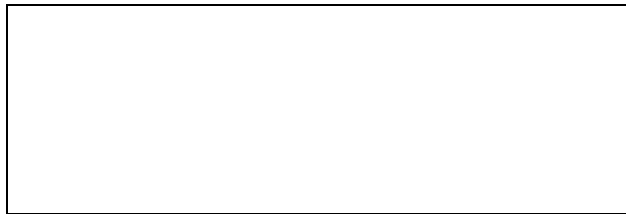


**KA2 - Cooperation for innovation and the exchange of good practices**

**KA204 - Strategic Partnerships for adult education**

**Active Strategies for Prevention and Handling Sexual Harassment Incidents (ASTRAPI)**

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**Scientific Policy Paper on Sexual Harassment**

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## Introduction

This paper is based on the experience gained by project partners in five countries, i.e., Bulgaria, Cyprus, Denmark, Greece, and Spain. It collects and attempts to synthesise information on relevant stakeholders' perceptions on existing legislation and good practices regarding sexual harassment in the five concerned countries. It constitutes the last intellectual output of the ASTRAPI project, and it is addressed to a broad audience that might be involved or interested in policies and practices around sexual harassment in work.

The paper follows the axes of the discussions organised in all participating countries, i.e.: overview of existing legislation and policies; existing good practices; recommendations for future policies. Discussions with relevant stakeholders took place in several forms in the five countries, providing empirical data that is indicative of how relevant institutions, key actors and frontline workers perceive and evaluate the existing legal and institutional frameworks in each country. The latter have been presented and analysed within the first intellectual output of the project, which included among others five national survey reports that fed the European Toolkit for effective implementation of policy to prevent and handle sexual harassment in the world of work.<sup>1</sup>

The aim of this paper goes beyond the description of the legal and policy framework with regard to sexual harassment; the main aim is to highlight how policies are evaluated by actors in the field, what kind of practices are deployed by different types of actors, i.e. public and private organisations, NGOs, universities, trade unions etc., and what kind of recommendations could enhance the scope and efficiency of policies and practices. In this sense, this paper attempts to enrich public dialogue with the experiences and suggestions of relevant stakeholders coming from different national and institutional settings.

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<sup>1</sup> The European Toolkit can be found in five languages (English, Bulgarian, Danish, Spanish and Greek) on the ASTRAPI project website: <https://astrapi-project.eu/project-toolkit/>

## Methodology - sample

As mentioned above, different methods have been used in different contexts, following however a common interview/discussion guide that covered the three main topics we examine: policies, practices and recommendations. For the most, our findings are based on focus groups and individual interviews, while in the case of Denmark a survey was conducted with members of trade unions.

More precisely, in **Bulgaria**, there have been eight interviews with representatives of trade unions, such as the Union of Bulgarian Teachers and the Confederation of Independent Trade Unions, municipal institutions, such as the Administration Department at the Municipality of Popovo, a municipal hospital and a municipal vocational school, a private university and two private companies.

In **Cyprus**, a workshop was organised with the participation of representatives of 14 institutions including: public institutions, such as the office of the Ombudswoman Cyprus and of the Equality Commissioner, the Municipality of Nicosia, the Cyprus Academy of Public Administration, and the Pedagogical Institute of Cyprus; employers' associations, such as the Cyprus Employers and Industrialists Federation, as well as trade unions, such as the Pancyprian Federation of Labour, the Pancyprian Public Servants' Trade Union, and the International Federation of Journalists; universities and research centre, such as the Frederick University Cyprus, European University Cyprus, and the Mediterranean Institute of Gender Studies; NGOs such as the Association for the Prevention and Handling of Violence in the Family, Hypatia Foundation Promoting Equality.

In **Denmark**, the focus on diverse experiences has been addressed by collecting quantitative empirical evidence from different actors and through different methods. More precisely, empirical data was collected via a survey to which 197 delegates from Danish workplaces in the FH area (trade unions that are members of the umbrella union-organization, FH) responded. These were asked about the sector they worked in, the gender distribution in their workplace, what preventive and coping measures are in place in their workplace, and their experiences with and attitudes towards these. In addition, three focus group interviews were held, in which three groups of delegates were asked to share their thoughts on what they perceive to be the main barriers to achieving a sexual harassment-free labour market and – by extension – what solutions they believe are needed to achieve this goal. In line with the requirements of the report, emphasis has been placed on the diversity of these three groups, across gender, ethnic background, religion, geography, sexual orientation, and age. Finally, the internal efforts to prevent and deal

with sexual harassment in the two unions, Dansk Metal and 3F, have been described and analysed.

In **Greece**, for the needs of the present paper, the Centre for Gender Studies of Panteion University organised four focus groups (from 18/10/2021 to 15/11/2021) via the Zoom platform with 31 participants in total. The discussions developed within the focus groups were based on the common Workshop/Interview Guide, agreed by the ASTRAPI consortium. The participants represented 28 relevant stakeholders of different types. More specifically, 3 Governmental Bodies, 5 private companies, 5 NGOs, 3 trade unions, 2 employers' associations, 5 Gender Equality Committees of Universities, and 5 Gender Equality Committees of Municipalities.

In **Spain**, the fieldwork involved 22 participants through five interviews and three focus groups. All participants were linked to six organisations (University of Barcelona, Rovira i Virgili University, Autonomous University of Barcelona, University of Girona, CCOO trade union, and FACEPA Federation). Some of the participants are part of the Solidarity Network of Victims of Gender Violence at Universities from different organisations.

The focus groups, the interviews and the survey conducted in the five concerned countries covered three main areas/thematic axes, which structure the analysis that follows in the next chapters:

1. Current knowledge and overview of existing legislation and policies on sexual harassment in each national context.
2. Experiences and good examples of preventive and coping initiatives in the labour market.
3. Potential recommendations for future formulated by relevant stakeholders.

## Overview of legislation and policies

In this section, we present the findings that concern participants' knowledge and experiences regarding legislative and policy framework on sexual harassment and its implementation in their area of action. The main interest in this section is how stakeholders and frontline actors evaluate available legal and policy tools, and whether they can make use of them in an efficient manner. The issues that were discussed concerned how familiar they are with the legislative and policy framework on sexual harassment, whether their organisation ever used existing legislative or policy tools to handle sexual harassment incidents, and whether they are satisfied with the existing policy framework, pointing out its strongest and its weakest elements.

In **Bulgaria**, sexual harassment does not seem to be a central issue in workplaces. Most of the respondents were not actually familiar with relevant legislation. Some were familiar with what is regulated in the Labour Code and the Law on Protection against Discrimination, which is the basis on which action can be taken in the event of sexual harassment in the workplace. It is important to note, however, that the former does not address sexual harassment as an issue at the workplace.

In the same vein, collective agreements that regulate labour relations mention the obligations of employers, in cooperation with trade unions in medical or health care institutions, to take effective measures to prevent all forms of discrimination, direct and indirect, of physical and psychosocial harassment and to ensure working conditions that prevent workers from chronic stress, physical and psychological harm in the workplace (article 65 of the Collective Agreement in Health Sector). As we can see, sexual harassment and violence in the workplace are not explicitly mentioned.

In the sector of education, the issue of sexual harassment in the workplace is only reflected in the collective agreement at the national level. In the 2020 Agreement, for example, it is noted that the Ministry and the social partners shall systematically and purposefully defend the authority and dignity of the teaching profession by developing and implementing policies to avoid violence and aggression against teaching professionals and non-teaching staff in educational institutions (article 3). As a representative of the Union of Bulgarian Teachers mentioned, "what is written in the Collective Labour Agreement is insufficient, but in education the problem of sexual harassment in the workplace is not significant, since in general education women represent the vast majority of staff." A similar view, that sexual harassment is not something important for school environments, was shared by a representative of a municipal vocational school, who claimed that this is the reason why even the national collective agreement in education does not specifically mention sexual harassment.

Some respondents mentioned that they are familiar with international conventions, such as the ILO Convention 190 and the Istanbul Convention, which have not been ratified by Bulgaria. This is mentioned as a serious drawback of legislation in Bulgaria, since in accordance with Convention 190, appropriate changes should be made to the Labour Code.

One respondent who represents a private university highlighted that the current system for dealing with sexual harassment in the workplace is based exclusively on the Protection from Discrimination Act 2003. The Law on protection against discrimination (2003) prohibits all forms of discrimination based on age, gender, ethnic group, national origin, education, family status, and property status. Within this law, harassment on the grounds of sex and sexual harassment, “shall be deemed discrimination”, while employers who receive “a complaint from an employee, considering him/her-self a victim of harassment, including sexual harassment, at the workplace must immediately carry out an investigation, take measures to stop the harassment, as well as impose disciplinary sanctions in cases where the harassment has been committed by another worker or employee.” It recognises sexual harassment as a form of discrimination and incorporates the EU definition of sexual harassment in law.

As it can be easily drawn from the above, incidents and formal complaints of harassment or violence have not been reported in the workplaces of the respondents. Even in areas, such as hospitals, where it is believed that nurses are usually the targets of harassment and violence, not only by doctors but also by patients, no such cases have come to their attention. Trade union representatives also reported that no such information has reached them, neither from union members nor from the management of companies, which should intervene in such cases. This has to do in some cases with the gender composition of workforce, e.g. over 90% of the staff is female, or with changes in practices after the privatisation of companies: “Interestingly, under communism some of the management had mistresses on staff and one of the first measures in the now private company was to stop such practices.”

In **Cyprus**, most of the participants were familiar to some degree with legislation and the policy framework that deals with incidents of sexual harassment. However, only three organisations (Ombudswoman Cyprus, Association for the Prevention and Handling of Violence in the Family and Pancyprian Federation of Labour) have direct experience in handling sexual harassment incidents. The other participants seemed familiar with the legal framework, either as training providers, researchers, and trainees at seminars that have attended on the subject.

However, some participants voiced their concern that knowledge of the policy framework does not extend to their constituencies/members, either because there is no training on the subject, or the one-time training is not sufficient to understand the whole spectrum and tools available to prevent and deal with SH incidents or provide support to the victims. Most of higher management in organisations have not attended any training seminars on the subject.

At least three organisations, as mentioned above, have used policy and tools to handle sexual harassment complaints. In some cases, there was a delay in the examination of the complaints from out of Court mechanisms as well as in cases that proceeded with litigation. A number of cases won in Court. Even those who lost some issues emerged that need to be improved in related legislation and the handling procedures.

Legal and policy framework is deemed satisfactory in the most part, however what matters the most is the practical application of the law, and to become part of all parties involved so that results can be more effective. Moreover, little emphasis is given to the procedures to investigate complaints of sexual harassment, and the provision of support to the victims. In addition, sexism is intertwined with racism, the multiple discriminations that people from other countries suffer from. Third Country domestic workers are without any support and guidance to deal with sexual harassment in the house in which they live. Little access is available to relevant agencies and NGOs to intervene. Same difficulties are evident in other non-regulated sectors for foreign workers as in agriculture and husbandry that is almost impossible to reach them and provide information/training and guides for the codes of conduct to prevent and handle SH incidents. There are also vulnerable groups of women, especially single parents who are plagued by poverty or unemployment and in order not to lose their jobs they remain silent to incidents of sexual harassment.

Key policy issues that need to be looked at include:

- Incorporating the Code of Conduct to Prevent and Handle SH in the work place as part of the collective bargaining agreements by all organisations/companies.
- Establish support mechanisms for victims of SH during the trying procedures to file complaints and take them to court or out-of-court settlements.
- The ASTRAPI project introduces some new elements that do not currently exist in the Cypriot legal reality and may give reasons to suggest and modify the Legislative Framework namely: SH done by third parties or it can happen in work environment or also how domestic violence can be handled in the workplace.
- The SH legal framework should include a mandatory provision that each employer is obliged to have a committee for Safety and Health to among other things deal with SH.
- Need to focus on exactly how we manage to have effective mechanisms for investigating such complaints and what measures and ways we practically support people who decide to make such a complaint.
- The policy framework should also include clauses on the employer responsibility to undertake measures to prevent and protect victims of SH.



The Pancyprrian Federation of Labour referred to a case they handled in the court as a reeve, saying “I really confess to you that I would not like to be in the position of the girl who was there, who made a complaint. The pressure, the regrets and the atmosphere were such that she must have such support that she can endure from the moment she decides to reveal it to denounce it to endure the process”.

In **Denmark**, the evaluation of policies was made, as mentioned above, through a quantitative survey. Where in the organisation and how a sexual harassment case is handled varies from workplace to workplace, and there is no clear or unambiguous answer to how sexual harassment is handled locally in workplaces. Workplaces are not obliged to have policies about sexual harassment and how it is dealt with even though we know how important it is for all companies to have clear guidelines for each step of the process when handling a case – from the time someone talks about a case of sexual harassment and all the way to the resolution.

Having a policy about sexual harassment is an important and fundamental step in both dealing with and preventing sexual harassment. Therefore, respondents were asked whether their company has a policy in this area. Around 2/3 of the respondents say that their workplace has a sexual harassment policy, which is positive. However, it is not insignificant that around 1/3 either do not have one – or do not know if they do. A policy is an important starting point for any workplace that wants to create a workplace free from sexual harassment.

Asked whether respondents are satisfied with their workplace's policy – in case they have one – the majority answered affirmingly. Among the approximately 2/3 of respondents who say that their workplace has a policy on sexual harassment, the satisfaction rate is quite high. Approximately 1/3 of all respondents have a policy with which they are "very satisfied", and additionally 1/3 of all respondents have a policy with which they are "somewhat satisfied". Only about 7% of those who have a policy respond that they are either "not very satisfied" or “not at all satisfied” with their workplace’s policy in this area.

To get a sense of whether sexual harassment is something respondents' workplaces are used to dealing with – and whether they have been successful in their efforts – participants in the survey were asked whether in their workplace they have any good experiences with handling or preventing sexual harassment. Close to half, 42%, say that they have no experience in either preventing or dealing with sexual harassment in their workplace. This is a high number, and sexual harassment does not seem to be an issue that workplaces are used to dealing with. The response could also indicate that many workplaces have never had a case of sexual harassment – probably not because it does not exist, but because the issue is not addressed openly and safely, which means that it is very unlikely that anyone will dare to come forward.

However, overall, 1/3 of all respondents say they have good experiences to some extent: about 1/4 of all respondents say they have had incidents of sexual harassment which they have dealt with well; 5.6% say they have good experiences preventing, and 5.6% say they have good experiences with both dealing with and preventing sexual harassment at work. 7.18% respond that there have been attempts in the workplace to deal with or prevent sexual harassment, but that it has not been very successful.

The responses here suggest that although around 2/3 respond that there is a policy in place – which can help both to deal with and prevent sexual harassment – only a smaller proportion of respondents, 1/3, say that they have good experiences in their workplace, either dealing with or preventing sexual harassment. This could suggest this it is not yet an area that the majority of workplaces have much experience of engaging in – beyond putting a policy in place, which is obviously also important, but an effort that cannot stand alone.

In **Greece**, most of the participants were familiar to some degree with legislation and the policy framework that deals with incidents of Sexual Harassment in the workplace either directly, for example the Law 4808/2021 that ratifies ILO Violence and Harassment Convention 190 and Recommendation 206 or the ones that deal with sexual harassment indirectly, for example the Law 4604/2019 (the establishment of Gender Equality Committees at Regions and Municipalities) or the Law 4589/2019 (the establishment of the Gender Equality Committees at Regions and Municipalities at Universities and Research centres).

Only few of the representatives of the organizations that participated at the focus groups mentioned that they had to handle Sexual Harassment complaints. Specifically, the big multinational companies used their internal procedures for the submission of the complaints and the final “solution” which in some the cases was the dismiss or the change of the working environment of the employee that was accused and proved to be the harasser. In the public sector when some complaints occurred the procedures were very slow and the results were not so positive about the employees that filed the complaints, some of them, were forced to retire early or were forced to change their job position.

There is a certain consensus among the stakeholders we have interviewed that the legal framework is sufficient and provides all the tools that facilitate the victims of sexual harassment to report the incidents and pursue administratively or legally the perpetrators. Nevertheless, the cases reported each year are far less than the estimated extent of the phenomenon.

Some representatives of the employees’ unions mentioned that there is fragmentation of legislation and discontinuity of the legal framework. There was also criticism that there are some are some points of the law 4808/2021 that need to be confirmed during its implementation and need to be clarified. For example, the creation of an autonomous department within the Labour

Inspectorate Body that will oversee sexual harassment incidents is a positive step, but what is crucial is its strengthening with staff and resources.

Another weakness of the above-mentioned law is that the procedures are not so clear, especially in small companies or in the public sector. The law refers mainly to the companies that have more than 20 employees, something that applies to a very small percentage of the companies in Greece. Another characteristic of the labour market in Greece that trade union representatives mentioned during the meetings is that for a significant part of the working population the working conditions are precarious, and this does not help them to become stronger and react to harassing behaviours for fear of being fired or creating an unfavourable climate towards them.

The large multinational companies adapted almost immediately and enriched their internal procedures in order to comply with the law. Small and medium enterprises do not have the resources and incentives to train their staff about these issues. Representatives of employers' associations suggested that the person that will be appointed to handle complaints about sexual harassment will be an external one not an employee of the Union.

The **Spanish** case has some specificities because the information collected comes exclusively from universities that have developed several policy tools to handle sexual harassment incidents. All participating universities have specific units that deal with gender equality, and they all developed plans and protocols that cover gender issues. There are also protocols for the prevention, the detection, and action against situations of sexual harassment, which also include specific actions in the field of sexist and LGBTQI violence.

Therefore, according to the participants in the research, the main strengths and weaknesses identified regarding policy framework can be summarised as follows:

#### Strengths:

- Presence of policy framework on sexual harassment.
- Implementation of evidence-based policies
- Incipient incorporation of an IGV perspective in some policies
- Importance of informal support and reporting networks.

#### Weaknesses:

- Many other universities do not have protocols, or these are not known.
- Lack of positioning by universities.
- Need to improve the selection systems of those responsible for implementing policies.
- Lack of mechanisms to prevent and manage IGV.

- Need for sanctioning tools to combat the feeling of impunity.

The existence of equality policies, protocols, and units in Spanish universities is related to the 2007 Law for the Effective Equality Between Women and Men was passed. Article 48 of the Law requires companies to create specific measures to prevent sexual harassment in the workplace, stipulating the establishment of procedures to facilitate reporting of harassment by victims and an obligation of worker representatives to report to the head of a company any harassment of which they are aware. In addition, Article 62 of the Law requires the development of protocols to prevent sexual harassment by companies, stipulating the need to investigate complaints and clearly identify the person responsible for assisting victims. Despite the concrete progress that this Law envisaged in terms of measures designed to act on and prevent sexual harassment, Spanish universities have primarily ignored the Law because of their continued lack of acknowledgment for the existence of violence against women in their institutions. Hence, the measures established by the Law for the Effective Equality Between Women and Men, such as the development of specific protocols against sexual harassment by commissions of equality, have not been implemented in most Spanish universities.<sup>2</sup> In some cases, universities do have policies and protocols in place, but these are unknown to most organisation members.

Institutional commitment has been highlighted as a critical element, as in many cases, universities have formal mechanisms. Still, they are ineffective since people who occupy the central positions are not committed to the problem. In many cases, sexual harassment is not prioritized in the initiatives promoted, or Equality Units prioritize focusing their actions on less controversial issues that do not require a clear position. This element is also related to improving the selection systems of those responsible for Equality Units. In many cases, in Spanish universities, these positions are granted to people with recognition in the institution. These, in some cases, obtain this position because of their status or inclusive relationships and not because they have demonstrated a recognized research career in the field of gender-based violence or sexual harassment. The lack of objective criteria for attributing these positions has led to measures initially designed to protect victims being used to protect the institution and even the perpetrators. Therefore, in institutions where this happens, it feeds the message of impunity towards perpetrators of sexual harassment.

On the other hand, cases where the institution's positioning is to end sexual harassment have been identified. In these cases, the people in charge of these positions show relevant track records in international research against sexual harassment and prioritize the inclusion of evidence-based policies and actions (see sections on best practices). These universities are

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<sup>2</sup> See García-Lastra, M., & Díaz-Díaz, B. (2013). Equality of opportunities at Spanish universities? Learning from the experience. *Multidisciplinary Journal of Gender Studies*, 2, 255-283.

succeeding in creating a climate of zero tolerance towards sexual harassment, which helps to ensure that top-down efforts are complemented by bottom-up initiatives (e.g., victim support networks).

## Good practices

Apart from the knowledge of the legal and policy framework, an important aspect of handling sexual harassment is the existence and implementation of good practices in workplaces. These good practices might emanate from the legal framework, in the sense of concretising regulations in specific organisational settings; they might also come from *ad hoc* initiatives generated by specific organisations or actors within organisations.

In the **Bulgarian** case it seems that sexual harassment is not dealt as an important issue in the various areas, represented by the participants in the research. No cases have been reported, even to persons in charge of safety and health at workplace. It is indicative for example that in the Teachers' Union there have been no cases of sexual harassment or at least no information about such cases has ever reached the Headquarters. According to the representative of the union, on the spot these cases are solved by the employer or complaints are submitted to the Regional Commissions for Protection against Discrimination. Similarly, lack of reported cases was mentioned by all participants, representing public, municipal, private or non-governmental organisations.

It is revealing that in universities although there is a lot of talk about incidents of sexual harassment and about similar practices – mostly by lecturers towards female students – related to the taking of exams, no complaints have been received. A representative of a university reported that she was not aware of any such incidents, even in the past when she was Dean of one of the faculties, neither the Commission for the Protection against Discrimination has been approached, which means that there have been no complaints at the university. It is important to note that this does not seem to be the case only for the specific university; the issue of sexual harassment and violence in the workplace has never been addressed at the standing meetings of the rectors of higher education institutions in the country.

Specific procedures are laid down at national level only in exceptional cases and sectors, such as the collective agreement of the Independent Transport Workers' Union,<sup>3</sup> which provides specific guidelines and measures such as:

- The employer shall have a zero-tolerance policy to stop violence at work in its various manifestations - physical, mental, sexual (art. 66).
- The employer shall implement a policy to raise the awareness of managers, workers and employees through training in order to identify the signs of harassment and violence in

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<sup>3</sup> It is important to note that this normative framework has been created thanks to the efforts of Enaterina Yossifova, President of the transport union, who was also instrumental in the creation and adoption of the ILO Convention 190, not yet ratified by Bulgaria.

the workplace, and to initiate preventive or corrective action to help victims. The measures shall also cover and be applied to third party violence (art.67).

- The employer shall implement procedures to be followed in cases of harassment or violence, which shall include at a minimum: an immediate internal investigation and an impartial hearing; keeping statistics; seeking feedback; taking appropriate disciplinary action against perpetrators if they are employees of the same enterprise; supporting the victim and, if necessary, providing psychological assistance for their reintegration (art. 68).
- Measures aimed at preventing workplace violence and harassment, including gender-based violence and harassment, should be included in internal workplace regulations.

Another sector that has systematically addressed violence and harassment in the workplace and has included specific provisions in sectoral collective agreements and the establishment of occupational safety and health committees, is the health sector. The sectoral collective agreement stipulates that the employer, in conjunction with the trade unions in the health service, must take effective measures to prevent any form of discrimination (direct or indirect) or physical or psychosocial harassment and must ensure working conditions that protect workers from chronic stress, physical and psychological harm in the workplace.

From the above, it comes as no surprise the fact that none of the participant organisations have a Gender Equality Plan or are planning to draft one. Similarly, they have not organised or encouraged their members to participate in any kind of training on preventing or dealing with sexual harassment. The latter would interest members of private companies and trade unions, but so far, such training has not been offered.

The situation in **Cyprus** can be considered different, since there are some initiatives undertaken by different actors. Since 2018 onwards, the Ombudswomen Office was one of the main institutions that proceeded in the preparation of the Guide for prevention and handling sexual harassment in the public service sector. Moreover, the Ombudswomen Office regularly holds seminars in the wider public sector to discuss with their staff these issues. They organise in-depth information and training on these issues, with the equality committees and the equality officers that have recently been established in public services organisations to handle sexual harassment complaints within their organisation.

Training seminars for their members are organised also by trade unions, while the Employers and Industrialists Federation organises training seminars for its members and other entities as well, e.g. municipalities. Finally, NGOs such as the Mediterranean Institute of Gender Studies, the Association for the Prevention and Handling of Violence in the Family and the HYPATIA Foundation organise training seminars for their members as well as other organisations, academic institutions interested agencies.

Beyond seminars, in the Plan for Equality between men and women one of the seven thematic goals is the fight against gender-based violence, where sexual harassment is defined as a form of violence, which as a global phenomenon plagues all men and women, but certainly the majority are women. Public bodies, municipalities and trade unions have adapted codes of conduct regarding sexual harassment. Other academic institutions are in the process of preparing their own Code of Conduct. Moreover, some of the participating organisations have adapted a Gender Equality Plan or similar formal policy.

For most of participating organisations there are provisions in dealing with sexual harassment incidents, however some of them have not as of yet utilised the procedures described in the legal framework or the Code of Conduct, as there were no complaints filed. However, the Unit for Prevention and Handling sexual harassment at work of the Pancyprian Federation of Labour, one of biggest trade unions in the country, has handled cases of employees; some cases were handled out-of-Court, others in Court.

In **Denmark**, several good practices seem to exist in workplaces through the initiative of employers and/or trade unions. Several participants in the research respond that their work to prevent and deal with sexual harassment consists of both more formal measures such as information meetings and consequences for employees who harass, but also more informal conversations and statements about how sexual harassment is not acceptable.

Overall, the responses can be divided into four categories:

- informal preventive initiatives (talking about the culture regularly),
- formal culture-building initiatives focusing on dialogue (training, meetings),
- focus on consequences for harassers and strong management, and policies,
- guidelines and the like.

Several respondents describe that they focus on ensuring an ongoing conversation and focus on the topic of sexual harassment. This is positive as everyone will be reminded of the behavior expected of them – and they will be reminded that help is available if they are subjected to sexual harassment. In addition, several respond that they have held meetings where the dialogical approach has been used preventively: “Together with the employer organization we have developed a dialogue tool. We played this in the workplace, and it led to good discussions.”

When it comes to good experiences with dealing with sexual harassment, several highlight the importance of quick and proper response from management when a report of sexual harassment is made, as well as the importance of leaders who take the reports seriously, taking the lead in ensuring that the harassing situation is stopped. Finally, respondents also highlight that their



policies, code of conduct or whistle-blower scheme play an important role in addressing and preventing sexual harassment.

Specific focus has been made in the Danish case to initiatives undertaken by two major trade unions. The first one is Dansk Metal – or Danish Metalworkers’ Union, which is a 125-year old union that includes employees who generally work in the industrial, building, and transport sector. In order to gain insight into Dansk Metals’ initiatives that are aimed at dealing with and preventing sexual harassment within the organization, an interview was conducted with a consultant in the Gender Equality and Diversity Team, who has been a major part of both the development and implementation of several of Dansk Metals' initiatives. The main initiatives of Dansk Metal on sexual harassment are the following (some already implemented and some planned but not already launched):

- Initiative 1: Policy "Sexual harassment and bullying"
- Initiative 2: Internal preventive workshops in all Dansk Metal’s teams
- Initiative 3: Courses in local branches of the Confederation of Danish Metal
- Initiative 4: Survey on well-being, including sexual harassment, among the organization's employees
- Initiative 5: Survey on sexual harassment among members
- Initiative 6: Prevention of sexual harassment in the automotive sector and best practice departments
- Initiative 7: Gender equality as part of the initial training of Dansk Metal’s delegates

The other union examined is 3F or the United Federation of Workers in Denmark, which is the biggest union in Denmark covering employees who work in the green sector, the industrial sector, the building sector, the public sector, the hotel and restauration sector, and the transport sector. 3F has been developing the following initiatives on sexual harassment:

- Initiative 1: 3F’s policy on harassment
- Initiative 2: “Crossing the line”<sup>4</sup> workshops within the organisation
- Initiative 3: 3F’s whistle-blower policy
- Initiative 4: “Crossing the line” workshops in 3F’s local branches
- Initiative 5: Collecting information on the number of cases in 3F’s local unions

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<sup>4</sup> “Crossing the line” is a dialogue game developed by the trade union. The game is played by dividing participants into groups and asking them to talk about different statements that are written on some cards. These statements could be “You look great today!”, “That dress fits you really well”, “Promotions happen in the copy room” and so on. The idea of the game is for participants to talk about whether they think each statement is above crossing the line or not – and to what extent. The dialogue between the participants – expressing and listening to what each other are saying - is the focus of the game. The game thus trains employees’ awareness of the fact that we all have different boundaries, and the game also trains employees’ ability to communicate about these boundaries.

In **Greece**, despite the problems in the effective implementation of legislation, which is evaluated as comprehensive but difficult to put into practice broadly, several good practices have been reported during the workshop sessions. These include publication of toolkits, research, set up of mechanisms, action plans, and implementation of focused projects. The actors involved in these activities are diverse with a variety of scope and objectives.

To begin with, the Research Centre for Gender Equality (KETHI) published in March 2022 a Training Toolkit on Violence and sexual harassment in the world of work.<sup>5</sup> Meanwhile, the Union of Civil Servants' Associations conducted a large-scale survey in order to document to what extent employees in the public sector are subjected to sexual and moral harassment and sexist behaviours in the course of their work and how these behaviours can be eliminated through the adoption of specific measures and policies. The results of this research are to be published soon.

At the level of employers, it must be noted that some large multinational companies have established online complaint mechanisms, which are run by third-party companies, where employees can file their complaints by phone or in person. A representative of large multinational insurance company highlighted as a very important feature of their Code of conduct that it was co-created by the administration and the employees, i.e. it was a bottom-up procedure, not imposed by the company. Moreover, the largest employers' association in the country and several companies participate in a EU-funded project called EMBRACIVE "Embracing Diversity and Fostering Inclusion in the Workplace",<sup>6</sup> which aims at promoting diversity in business, both in Greece and in Cyprus. In Greece more than 150 private and public sector companies, with more than 50,000 employees, have already signed the Greek Diversity Charter, incorporating into their daily operations practices of efficient inclusion of different employees, with multifaceted benefits.

There have also been some developments at the level of State, regional and municipal governance. This has been boosted since January 2021, when a #Metoo movement appeared in Greece, rendering sexual harassment and gender-based violence central issues in the public sphere. In this vein, [Metoogreece.gr](https://metoogreece.gr) is the website of the State that collects all the necessary information and emergency telephone numbers on issues of sexual harassment, abuse and authoritarian violence as well as actions to combat them. The website also announces initiatives aimed at helping everyone to act against to any form of harassment and abuse. Moreover, the Ministry of Labour and Social Affairs published – in the framework of the articles 9 and 10 of the Law 4808/2021 that ratified the ILO Convention 190 – a model of policy and made it

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<sup>5</sup> [https://www.kethi.gr/sites/default/files/attached\\_file/file/2022-04/KETHI\\_sexual\\_harassment.pdf](https://www.kethi.gr/sites/default/files/attached_file/file/2022-04/KETHI_sexual_harassment.pdf)

<sup>6</sup> <https://embracive.eu>

available to companies and organisations in order to facilitate them to create their own relevant procedures.

At regional and local level, some Municipalities and Regions have approved Gender Equality plans which include actions to prevent sexual harassment. The Municipality of Athens in particular drafted an Action Plan to Prevent and Combat Sexual Harassment focusing mainly on: a public commitment for zero-tolerance policy against sexual harassment; training of the personnel; awareness campaigns in the organisation, in the city and in other Municipalities; change of the regulation’s framework and establishment of Complaints procedures; collaboration with other institutions; evaluation of the action plan.

Significant activities for that matter have been developed by several NGOs. One of the invited NGOs informed us about a new project that coordinates: “PRESS| Sexual and cyber violence| Preventing, responding, supporting young survivors”, which aims at promoting early detection and prevention of sexual harassment and violence, with a particular focus on gender-based cyber sexual violence, and at offering support services to women, young people, and LGBTQI victims or potential victims of these types of gender-based violence.

Another NGO implements the project “Stand up against sexual harassment in public space”.<sup>7</sup> During the project training seminars were held for students, working and non-working women of all ages and working in large companies. The aim of these seminars was to inform and empower a wider group of people with different living conditions, which will push them to stand tall and feel safe in case they are harassed in a public place to witness a similar incident. Another NGO representative reported the “Speak out” project,<sup>8</sup> which offers free legal aid for women who have experienced sexual harassment at work. Finally, an NGO conducted research on sexual harassment in the tourism industry, which is very important in Greece.<sup>9</sup>

When it comes to universities, some of them have created an online tool to receive reports for sexual harassment incidents. Panteion University has also implemented the project USVReact: Universities Supporting Victims of Sexual Violence,<sup>10</sup> during which each partner university created a training model with 80 of its own staff – academic and administrative – as well as students and conducted an independent evaluation of it. Some universities have also drafted guidelines on how to deal with sexual harassment.

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<sup>7</sup> <https://www.standup-international.com/gr/el/>

<sup>8</sup> <https://speakout.actionaid.gr>

<sup>9</sup> “Not part of our job”: [https://notpartofourjob.actionaid.gr/public/ActionAid\\_Harassment-Report.pdf](https://notpartofourjob.actionaid.gr/public/ActionAid_Harassment-Report.pdf)

<sup>10</sup> <https://usvreact.eu>

As far as training is concerned, the majority of participant organisations have either participated in related training or in organising training seminars on sexual harassment. Representatives of trade unions reported that they plan to organise training programmes for private and public sector employees. Some private companies are training every year their personnel on gender equality and gender-based violence issues. The National Centre for Public Administration and Local Government also offers training on gender equality issues for employees in the public sector.

Finally, some of the participating organisations, especially the ones that have established Gender Equality Committees (i.e. Universities, Municipalities and Regions), have adapted their Gender Equality Plans in order to include prevention and handling of sexual harassment incidents as one their main goals. Universities and research centres in particular, are obliged to adopt Gender Equality Plans in order to be able to receive funding from the European Commission within the HORIZON EUROPE framework.

In **Spain**, the leading good practices identified are based on the following:

- Including the Isolating Gender Violence (IGV) perspective in policies.
- Forming formal and informal support mechanisms for victims of sexual harassment.
- Basing policies on scientific evidence that has demonstrated social impact.
- Incorporating co-creation processes in the design and implementation of policies.

As discussed above, protecting those who protect victims of sexual harassment is fundamental to ending the problem. To this end, protocols and policies must incorporate the IGV perspective. The University of Girona (UdG) was the first university to include this perspective in its Equality Plan. Specifically, the Second Equality Plan of the UdG (approved in Governing Council 3/2021 of 29 April 2021) indicates the need to establish mechanisms for prevention and action against the IGV.<sup>11</sup>

International research shows that institutional measures alone fail to prevent harassment, and therefore other avenues also need to be created. Peer support networks are one of them. There are outstanding experiences in this regard, such as the PAVE (*Promoting Awareness Victim Empowerment*) programme at the University of Wisconsin, among many others. In this sense, the Solidarity Network of Victims of Gender Violence at Universities<sup>12</sup> is the first peer support network in Spain. This network, created in 2013, is made up of students, alumni, and faculty from various Spanish universities. It has been recognized as a Good Practice by the Observatory against Gender Violence of the Women's Foundation of the Ministry of Equality of Spain and the

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<sup>11</sup> UdG Equity Plan: <https://www.udg.edu/en/compromis-social/arees/igualtat-de-genero/el-pla-digualtat>

<sup>12</sup> <https://www.facebook.com/RedSolidariaVGU/>

European Commission. This network enables peers to become allies, creating spaces for support, assistance, and solidarity.<sup>13</sup>

Most prestigious international universities have a definite institutional policy on sexual harassment to make the university a space where such a situation is unacceptable. This policy regulates disciplinary action for both verified cases of sexual harassment and malicious allegations. These policies are implemented in programs and action plans, designed, developed, and evaluated by specific offices. They are usually offices that also collect complaints. These offices also analyse the programs carried out by the university and investigate strategies that prevent gender violence to improve the services provided. Some of these offices publish annual reports of sexual harassment and assault at the university. For instance, in the case of the University of Oxford, mixed commissions consist of faculty, students, and university staff to conduct research harassment cases.

Previous CREA research has identified a wide variety of initiatives related to the prevention and awareness of sexual harassment. These include leaflets, reporting offices, hotlines, prevention workshops (e.g., Princeton University, Yale University), campaigns, men's organizations (e.g., N.O.M.O.RE at Yale University or Men Against Violence in Columbia University), sexual harassment counsellors or referrals, or websites and forums where victims can share their experiences. In this regard, it is also worth mentioning the strategies identified by the UNI4Freedom project, which aims to end violence and harassment against the LGBTQI+ community. Among them are Gay-Straight Alliances,<sup>14</sup> initiatives such as Campus Pride<sup>15</sup> and Safe Zones,<sup>16</sup> and victims care and support services.

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[https://redsolidariadevictimasvdgunis.blog/?fbclid=IwAR1MTBPm6FPCbmMwqxZ9Y\\_IJQGeeCay5gCD\\_BsvL100wE4IwzLkdwoRTzzU](https://redsolidariadevictimasvdgunis.blog/?fbclid=IwAR1MTBPm6FPCbmMwqxZ9Y_IJQGeeCay5gCD_BsvL100wE4IwzLkdwoRTzzU)

<sup>14</sup> <https://gsanetwork.org>

<sup>15</sup> <https://www.campuspride.org>

<sup>16</sup> <https://thesafezoneproject.com>

## Recommendations

Based on their experiences and on their assessment of existing policies and practices, participants in the research in the five countries were asked to provide information about their participation in consultancy, and whether they have elaborated any policy recommendations regarding sexual harassment in workplaces.

In **Bulgaria**, according to the interviewees, the legal framework is still missing, so any ideas, such as the tools that have been developed within the ASTRAPI project, collide with the reality. There have not been any consultation processes to ratify the ILO Convention 190. In view of the Covid pandemic and the lack of a functioning government in Bulgaria over the last year, the ratification process is not relevant, but this was mentioned as one of the objectives of the Confederation of Independent Trade Unions. More precisely, the Confederation's main task in this area is first to force the ratification of the Convention 190 and then to introduce the relevant normative changes in the Labour Code, and hence to be reflected in the Collective Agreements, in order to achieve the development of a mechanism and procedures to deal with sexual harassment and violence in the workplace.

In **Cyprus**, some of the organisations, including the Ombudswomen Office, the Equality Commissioner and trade unions, have participated in consultation processes and have drafted and/or communicated policy recommendations during the drafting of related legislation or preparing and adapting Codes of Conduct.

When it comes to recommendations, it has been noted that training to prevent and deal with sexual harassment is very important. However, a comprehensive training programme should include:

- Needs assessment, e.g. what you need to know and your perception on sexual harassment topics is;
- take fear out of conduct with co-workers of being accused of either potential perpetrators or potential victims;
- experiential training in teams as a methodology to share views, understanding and knowledge so that they can take ownership and feel part of the change in attitudes;
- understand gender stereotypes and how they affect education, media, and social policy as a means to perpetuate patriarchal perceptions;
- hold employers responsible for adapting measures for prevention and appropriate handling of sexual harassment incidents.

As sexual harassment in the workplace is a relationship of power, the Code of Conduct should not be created by people in power in the workplace. Third party experts should be invited to develop the code that will become a useful training tool, presenting basic principles and skills.

There needs to be a systematic and unwavering effort for information, and awareness building on all aspects of prevention and handling on Sexual Harassment but also adequate staffing to provide guidance and support of the victims of Harassment. Moreover, there needs to be an effective mechanism for enforcement of the law as it relates to quick examination of complaints and social and psychological support of victims.

Finally, it is very important to train agencies and bodies who have the responsibility to investigate cases and/or to prosecute incidents. This means that a greater effort needs to be placed to train the investigating authorities, the prosecuting authorities or even the judges themselves so that re-victimisation of victims is avoided at all levels when a formal complaint is filed.

In **Denmark**, recommendations collected within the research conducted are divided in three major categories: general recommendations, recommendations for handling cases, and recommendations for prevention.

General recommendations can be summarised as follows:

- Shift from a direct to an indirect language in surveys about sexual harassment in the labour market. Don't (only) ask the question "Have you been sexually harassed?", but ask about different, concrete types of unwanted sexual attention ("jokes", comments, touching, invitations, etc.). In December 2020, the National Research Centre for Work Environment made it clear that they were working on formulating different and more concrete questions, so that in the future they do not ask about experiences of "sexual harassment", but instead ask about experiences of specific forms of unwanted sexual attention.
- More (specific) legislation on what a company is obliged to do to both deal with and prevent sexual harassment. The labour market will not be free of sexual harassment until greater responsibility is placed on employers/companies.
- Required training for management and delegates about how to prevent and deal with sexual harassment.
- Requirement for companies to set up a forum where among other things, sexual harassment will be on the agenda.
- Introduce a smiley system or something similar, open to the public, which indicates how a company is doing in their work to prevent and deal with sexual harassment. In this way,

companies can use their good commitment to brand themselves positively to customers and new employees.

- The level of compensation needs to be increased further. There is not enough financial incentive to ensure that sexual harassment does not happen.
- Leave out – in policies, in conversations, etc. – the focus on how harassed people should speaking out against sexual harassment.

Recommendations for handling can be summarised as follows:

- Find out what deters companies that don't have a sexual harassment policy from getting one.
- Require companies to have a sexual harassment policy that includes: a statement saying that sexual harassment is not okay; who to contact if someone experiences sexual harassment; that any concerns will be taken seriously; and how to handle a case – the latter in as much detail as possible.
- Establish whistle-blower policies – but be careful that a whistle-blower policy does not dilute or get in the way of other initiatives aimed at preventing and dealing with sexual harassment.

Recommendations for prevention can be summarised as follows:

- Go through the company's policy on sexual harassment when hiring new employees.
- Pay particular attention to employees who are a gender minority in a workplace: women in male-dominated workplaces and men in female-dominated workplaces (and LGBT+ people). For example, set up mentoring initiatives where a manager, delegate or employee closely follows the minority employee and checks in regularly to talk about work life satisfaction and harassment. This can help to ensure that the minority employee is not subjected to sexual harassment, that they get help if it does happen, and that they do not leave their job and thus end up contributing to a gender-segregated labour market rather than contributing to its breakdown.
- Inform companies, managers, delegates, HR staff, etc. that conversations about boundaries, humour, language, culture, etc. are important and effective tools in the prevention of sexual harassment, because it creates a greater understanding of different boundaries and experiences, and because it trains employees to communicate about these very things.

In **Greece**, some of the organisations participated in relevant consultation processes, e.g. in the consultation on the bill that ratified the ILO Convention 190 in June 2021, but their representatives are not satisfied with the outcome. The research team that conducted the research for sexual harassment in the public sector for the Union of Civil Servants Associations



recommended that in order to address sexual harassment in the public sector, the legislative framework governing civil servants (Law 3528/2017) needs to be completed and adapted in line with the current international and EU law and in particular the recent ratification of the International Convention 190 on the Elimination of Violence and Harassment in the Workplace. At the same time, it is proposed that a “Protocol for the prevention and response to sexual harassment in the public sector” be drawn up immediately in line with the best practices of other organizations in Europe and Greece.

Many representatives mentioned that it is very important to create and establish a zero-tolerance policy to Sexual Harassment in the workplaces and of course in the society. Every organisation, company, NGO should make clear in every possible way that these behaviours won't be tolerated. Another important thing that people in every level (employees, employers, clients, suppliers) should be informed about their rights and on how to defend themselves against these behaviours or how to intervene when they are watching them. It is also important to train agencies and bodies who have the responsibility to investigate cases and/or to prosecute incidents.

Some participants of the focus groups suggested that there should be a broader collaboration between the organisations (especially NGO's and Universities) that are familiar with the Sexual harassment incidents and the ones that are trying now to set the framework on how to prevent and to deal with this kind of incidents. There should be a knowledge transfer, with training and awareness activities. Some representatives of municipalities also suggested that in the annual budgets of their organisations there should be separated codes for activities related to gender equality, gender-based violence issues and Sexual Harassment, in order the gender equality committees to be more flexible to organise these activities. Some unions' representatives mentioned that there are many actions, training opportunities and awareness events that are not widely published and at the end the people who face Sexual Harassment Incidents are not well informed or prepared on how to handle it even when they experience it themselves or their colleagues.

The recommendations obtained in **Spain** could be summarised as follows:

- IGV must be included as a key element in the fight against sexual harassment in all public spaces, both online and offline, from all fields (educative, political, and social). The first step is public recognition of this type of violence, as well as a clear rejection positioning.
- Prevention programmes of sexual harassment from early childhood including kindergarten, primary school, high school, and university must be based on scientific evidence. Such programmes cannot be oriented from ethic conceptions only, but also from the language of desire, referring to violent people as cowards, and referring to those

who support victims and who suffer violence as brave. This type of language must be included in all educative stages and all social fields (enterprises, leisure spaces, the street, the Internet, hospitals, etc.), as without the link of the language of desire and the language of ethics we cannot make progress in the eradication of this type of harassment. The link of the language of desire and of ethics must also be included in audio-visual productions, both in the cinema and the increasing video games business. We highlight the need for these programmes to be based on scientific evidence rather than occurrences, as has been demonstrated, for instance, that being in love with a non-violent person becomes a preventive factor of gender violence instead of a causal one, as some speeches have tried to present, as well as promoting new alternative masculinities.

- Special importance for preventing online sexual harassment has been placed in the media, whether it is social media, traditional mass media, or other enterprises that work online. Society is claiming to improve mechanisms of report and protection that already exist but are not enough. Another contribution is to recognize the work of those journalists or media producers who are committed to supporting victims of sexual harassment and are doing a rigorous job, including international contributions most significantly related to the coverage of sexual harassment. In our context, we find that there are media that support victims but others that protect harassers and those who attack the victims, sheltered under the freedom of expression. This debate, however, has been solved for a long time in research and the social world of prevention of sexual harassment: support to the victims is more relevant than the right of freedom of expression of the media whenever this expression serves to blame the victim and protects harassers.

Furthermore, some specific recommendations that should be considered from the policy sphere have been made:

- Train the entire university community in scientific evidence to identify sexual harassment.
- Create networks of solidarity that support and encourage partnerships
- Act and report in case of witnessing sexual harassment, supporting, and protecting the victim without revictimizing. Be upstander.
- Setting up an office to attend and support sexual harassments victims with representatives from the entire university community, to ensure that protocols are activated when receiving a complaint.
- Include curriculum content about sexual harassment
- Periodically evaluate the measures adopted to prevent and monitor sexual harassment.

## Conclusion

This paper brings together the experience gained by five members of the ASTRAPI project consortium regarding the views and experiences of relevant stakeholders in the respective countries. The level of awareness, the evaluation of existing policies and good practices, as well as general and specific recommendations are presented in the related chapters. The research conducted in the five countries has provided a rich material coming from the field and covering to a different extent several sectors and settings: from workplaces and actions undertaken by employers and trade unions to universities and local authorities.

One conclusion that can be drawn from the material collected and presented in this Intellectual Output of the ASTRAPI project is that there is a certain asymmetry among the concerned countries as far as policies and practices on preventing and handling sexual harassment is concerned. All examined countries are member states of the EU, and they all have transposed in their national legislation the EU directives on the implementation of the Equal Treatment principle, that provide a comprehensive definition of sexual harassment as a form of discrimination and consequent tools and mechanisms to deal with it. Nevertheless, there are seemingly significant differences between countries regarding the range of policies and practices around sexual harassment.

On the one hand, in Denmark both at legislative level and at the level of workplace arrangements between employers and employees, sexual harassment is dealt with various ways, some of which are participatory. On the other hand, in Bulgaria sexual harassment does not seem to have become an issue, neither in public institutions nor in workplaces, while continuous efforts of trade unions have not yet brought any tangible results, e.g., they have not managed to convince the government to ratify the ILO Convention 190. In Spain universities have played an important role in promoting the visibility and awareness around these issues with some important legislative outcomes. In Cyprus, relevant authorities and trade unions seem to be more active in the field, while in Greece the #Metoo movement emerged since January 2021, along with the persistent efforts of several NGOs, have increased the interest in gender issues in general and in sexual harassment in particular.

Speaking of diversity of actors in the field, one can see, on the one hand, differences in organisations' eagerness and flexibility to adapt their rules and regulations or set up mechanisms and tools to prevent and handle sexual harassment: it seems that large and well-established organisations, either companies or municipalities or universities are more capable to implement actual policies than small organisations. On the other hand, it seems that policies and practices addressed and developed directly in workplaces – of whatever kind – are more likely to engage people in thinking and acting in ways that could prevent potential perpetrators and help survivors.

The question raised recurrently in all settings – in some with much more intensity – is that of information and enabling persons at risk to have access to existing mechanisms. Even in the most elaborated and thorough frameworks of protection, e.g. in Denmark, reported case remain much lower than the actual ones. This verifies for one more time that a lot remains to be done at the level of communication and exchange in order to renegotiate the boundaries of what can and what cannot be acceptable in a safe and collegial environment. This paper, along with all the other outputs of the ASTRAPI project, aim exactly at providing stimuli for further reflection and pursuit of innovative solutions.

## Annex: Workshop/Interview Guide

1. Characteristics of the organisation
  - Type (public/private etc.)
  - Sector (in case of workplaces, employers' or employees' associations)
  - Size
  - Role of the respondent
  - Gender balance of the personnel
  
2. Overview of legislation and policies
  - Are you familiar with the legislative and policy framework on sexual harassment?
  - Has your organisation ever used existing legislative or policy tools to handle sexual harassment incidents? What was the outcome?
  - Are you satisfied with the existing policy framework? Which are its strongest and which are its weakest elements?
  
3. Good practices
  - Does your organisation have any good practices regarding the prevention and handling of sexual harassment incidents?
  - Has your organisation drafted any kind of rules or code of conduct regarding sexual harassment?
  - Does your organisation foresee any specific procedures to deal with sexual harassment incidents?
  - Has your organisation organised or encouraged its members to participate in any kind of training on preventing/dealing with sexual harassment at work?
  - Has your organisation dealt with sexual harassment incidents? In what way? What was the outcome?
  - Has your organization adopted a Gender Equality Plan?
  
4. Recommendations
  - Has your organisation participated in relevant consultation processes, e.g. in the consultation on the bill that ratified the ILO Convention 190 in June 2021?

- Has your organisation drafted and communicated any policy recommendations regarding sexual harassment?
- What would you suggest to improve policies aiming at preventing and handling sexual harassment incidents at work?
- Would your organisation be open/willing to adopt a new workplace policy such as the one suggested by the Astrapi project (<https://astrapi-project.eu/project-toolkit/>)?