

SAFE



AT

TO PREVENT
AND COMBAT
SEXUAL HARASSMENT
AND VIOLENCE
AT WORK

WORK



TRAINING
MANUAL
FOR HR STAFF



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WHY ARE WE DISCUSSING ABOUT SEXUAL HARASSMENT AND VIOLENCE AT WORK?

Sexual harassment and violence at work is not a new phenomenon and, unfortunately, it is not rare either, even in modern times.

According to a [recent survey of ActionAid](#), 85% of women in Greece have been sexually harassed at work. The cost - moral, physical, mental, communicational and financial - is enormous.

Sometimes, either as individuals or as managers of businesses and organisations, we ignore it or downplay its importance, because we see it as inevitable, we do not know how to prevent or address it, we fear the impact it may have on our public image, or because we believe it should not be such a serious concern.

In practice, however, we know that sexual harassment and violence in the workplace has adverse effects, both on the victims and on those who witness such incidents, on their teams, on the companies they work for and on the wider society.

The consequences are health-related, emotional, social and economic.

Individuals who suffer sexual harassment and violence at work are more likely to experience physical and mental health problems due to the stress they endure. They are also [much more likely](#) to quit their job, especially when they are frustrated by the (non-)response to the incidents they have experienced. Even for those who stay, though, the implications for their productivity, engagement and job satisfaction are considerable.

Similar manifestations of anxiety and disengagement are often displayed by individuals who have witnessed or are witnessing incidents of harassment. As a result, teams in which such incidents occur find it difficult to work together harmoniously and produce the best possible outcome. All these consequences affect the efficiency, profitability and image of a business and have a significant negative impact on the economy, the bonds of trust and the social cohesion of the wider community.

For all these reasons, preventing and addressing sexual harassment and violence at work is not just a women's cause, it is not just a legal matter, it is not just a task for leaders; it is the responsibility of each and every one of us, to the extent that we wish to work and grow in a safe professional environment.

AS EMPLOYERS,

we are called upon to ensure a safe environment and a culture of respect for our staff.

AS TEAM LEADERS,

we must act as role models for inclusive communication and demonstrate our commitment to zero tolerance.

AS COLLEAGUES AND CO-WORKERS,

even as bystanders, we have the opportunity to support individuals who are being harassed or to reassess our behaviours.

Taking a stance and making sure that all of us are protected from sexual harassment, is not a manifestation of failure; on the contrary, we are showing responsibility and concern for the most valuable part of our work: our people.

By taking the necessary steps to eliminate sexual harassment and create a framework of safety, respect and equality, we ensure a healthy working environment and contribute to the sustainability of a business.

WHAT IS AND WHAT IS NOT SEXUAL HARASSMENT?

According to Greek and European legislation, sexual harassment is any form of **unwanted, verbal, non-verbal or physical conduct of a sexual nature, with the purpose or effect** of violating the dignity of a person, particularly when creating **an intimidating, hostile, degrading, humiliating or offensive environment.**

This definition gives us many tools to fully and thoroughly understand the concept of sexual harassment and its different manifestations in the world of work.



«unwanted»

No, consensual flirting or consensual sexual relations between adults are not sexual harassment!

«verbal, non-verbal or physical conduct»

Sexual harassment is not always a persistent sexual advance. It can take the form of unwanted physical touching, comments, jokes or questions of a sexual nature, provocative looks or gestures, offensive behaviour or online communication.

«of a sexual nature»

Derogatory comments about a woman's abilities or particularities are not sexual harassment if they are not related to sex (such behaviours are «gender-based harassment» and are, of course, also problematic!)

«with the purpose or effect»

Our behaviour may constitute sexual harassment even if that was not our intention or purpose. In other words, the criterion is not the opinion of the perpetrator but that of the recipient of the conduct.

«intimidating, hostile, degrading, humiliating or offensive environment»

Sexual harassment does not always have a coercive character, but it can involve behaviour of a sexual nature that creates a hostile environment - not only for the harassed individual, but also for other people working in the same environment.

WHAT IS **NOT** SEXUAL HARASSMENT?

- **Consensual flirting** and **consensual sexual relations** between **adults**
- An **isolated unfortunate comment** that was **not repeated** when found to be unwelcome
- **Derogatory comments about a woman's abilities or particularities** and intimidating behaviour, such as threats, loud shouting, exclusion from work or unjustified offensive criticism, which are **not of a sexual nature** (such behaviour may constitute discrimination through gender-based harassment, intimidation or systematic stalking and should be reported, though it is not labelled as sexual harassment)



THE CONTEXT OF SEXUAL HARASSMENT

It is no coincidence that in 2019, the International Labour Organization used the term «world of work» in its official Convention to describe the many different contexts in which sexual harassment can occur.

INDIVIDUALS

In most cases worldwide, the victims of sexual harassment are women and the perpetrators are men. This does not mean, however, that sexually harassing behaviour does not also occur from women to men, as well as between individuals of the same sex.

RELATIONS

Furthermore, sexual harassment is not always committed by persons higher up in the hierarchy against their subordinates. It can also occur between colleagues or come from customers or suppliers. There is usually an unequal power dynamic between these individuals, but this is not always easy to detect at first sight, as it is not always based on the level of hierarchy.

ENVIRONMENT

Finally, incidents of sexual harassment and violence do not always occur in a specific workplace, such as an office or factory; they may occur in any place and at any time when a person is carrying out his/her work: on the street, at a business dinner, at a seminar, on a trip or during teleworking.

SOME EXAMPLES AND CASE STUDIES



HAVE A LOOK

M. is the only woman in her team. When they are working on a big project and need to stay late at the office, her colleagues tend to gather around a computer and browse through pornographic videos and photos. When M. expresses her discontent, the other members of the team accuse her of being oversensitive and tell her that they need “to chill out”.

The conduct of a sexual nature is not directly addressed to M., but it creates an offensive and hostile environment for her.

BAD RECEPTION

P. starts working at the reception desk of a PR firm. On the second day, a female editor at the company laughingly shows him a sex video on her cell phone. When P. tries to walk away, she persistently waves the phone in front of his face. Over the next few days, many of the female employees at the company ask him persistent questions about his body, while the company’s managing director asks him to choose a stripper for her husband’s birthday party.

Sexual harassment does not only happen to women. Most often, however, it occurs in situations where there is an unequal power dynamic between the individuals involved.

THE SOUL OF THE PARTY

In E.’s office, fun group hangouts and parties are often held, in which the men in the group demand that the women sing and dance or get up on their knees. Even in the office, men make sexual comments about female employees’ clothes, high heels or smile. With every inappropriate joke, one of the colleagues says: «put that in the lawsuit too» acknowledging that their behavior is problematic.

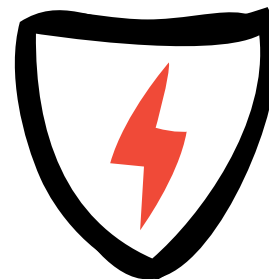
The risk of sexual harassment incidents is increased in contexts where there is regular heavy use of alcohol and other substances.

MESSAGE RECEIVED

F. attends her first seminar on sexual harassment and suddenly realises that when her boss sends her messages with sexual innuendos at work, such as «I work better in late hours», «This needs a drink» or «Maybe we should talk about this in my place?», he may be sexually harassing her. Until then, F., who had never worked before, tolerated this behaviour hoping that it would stop, but it’s actually been going on for months.

A young person may be at higher risk of sexual harassment because they lack the necessary experience to recognise promiscuous behaviours and stop them.

MEASURES AND POLICIES AGAINST SEXUAL HARASSMENT AT WORK



Under Greek law, all employers have an obligation to take concrete measures to prevent and address violence and harassment at work, to apply zero tolerance to such incidents or behaviour when they receive and are called upon to deal with such complaints, to provide information and training in accessible formats about the risks, the prevention, the protection and the obligations of those involved (Articles 5-7, Law 4808/2021). Businesses employing more than twenty (20) workers are required to draw up relevant policies in accordance with Articles 9, 10 and 11 of Law 4808/2021.

These policies must be written in gender-inclusive language and include 4 distinct but necessary and interrelated levels of action, which of course must be systematically implemented and evaluated. These levels are:

- 1. RISK ASSESSMENT:** Businesses are required to assess the risks that may exist in their own workplace and increase the likelihood of sexual harassment and violence incidents occurring therein.
- 2. PREVENTION:** Businesses should design policies to prevent the occurrence of incidents of sexual harassment and violence, protecting male and female employees, partners, customers and suppliers.
- 3. RESPONSE:** Businesses should establish procedures and mechanisms for safe reporting and handling of incidents of sexual harassment and violence occurring within their sphere of responsibility.
- 4. AWARENESS-RAISING:** Businesses are encouraged to take action to raise awareness among their staff about the phenomenon of sexual harassment, to train individuals on how they can help prevent and respond to it, and to inform all parties involved of the relevant procedures and policies.

Below we will examine in more depth these 4 levels of intervention and the ways in which appropriate initiatives can be implemented at each of them.

1. RISK ASSESSMENT

Sexual harassment is a phenomenon that concerns all workplaces and all individuals, regardless of their specific characteristics. However, international and [Greek literature has revealed](#) that there are characteristics that make certain work environments and certain groups of workers even more vulnerable to abusive behaviour.

To prevent and combat sexual harassment and violence, every business should carry out regular risk assessments, both at company level and in relation to individual departments or groups of workers. This process is necessary for taking appropriate measures to reduce the risks involved and to protect effectively all employees and partners of the company.

In the annex «Useful tools» you can find a handy risk self-assessment tool, which can be used by any HR or management team in a company to plan, improve and implement its policy effectively. It is important that the self-assessment process involves teams of managers and/or employees, and is not implemented by just one person.

FOR THE BUSINESS / ITS DEPARTMENTS

Sexual harassment and violence do not depend so much on the individual or psychological characteristics of the perpetrators or victims, but rather on the characteristics of the environment in which individuals shape and normalise their behaviour.

Most workplaces have one or more of the characteristics/risk factors listed here. This does not necessarily mean that incidents of sexual harassment occur in all these workplaces. But it does mean that, in any case, vigilance is imperative for those involved, at all levels of responsibility and hierarchy in the organisation.

Some of the factors that increase the vulnerability of a work environment to incidents of sexual harassment include:

THE OWNERSHIP STATUS

The analysis of SH incidents reveals the vulnerability of women who are part of family businesses.

THE WORKPLACE

Incidents of sexual harassment are more likely to occur in isolated workplaces, where male and female employees work in isolation from wider groups and have limited opportunities to interact with others. At the same time, decentralised work environments (such as chains), characterised by a limited flow of communication between their units and limited accountability and/or training of managers, can be a fertile ground for incidents of sexual harassment.

THE GENDER DIVERSITY IN THE ORGANISATION

Harassing behaviour is more common in workplaces characterised by a lack of diversity - in the case of sexual harassment, in male-dominated workplaces.

THE POWER DYNAMICS

Sharp inequalities in the degree of power of different groups of workers are an important risk factor. Typical examples are companies with senior executives and low-ranking managerial staff, factories with supervisors and unskilled workers, the military, etc. And when disparities in the level of power are also gender-based (e.g. when, as is often the case, senior managers are mostly men and junior managers are mostly women), the risk becomes even greater.

THE ABSENCE OF POLICIES AND PROCEDURES AND THE PERCEPTION THAT SEXUAL HARASSMENT IS AN INEVITABLE PART (PERHAPS EVEN A REQUIREMENT) OF THE SPECIFIC JOB

These factors, in addition to encouraging and facilitating individuals who want or have a tendency to commit sexual harassment in the workplace, also shape accordingly the socialisation of all employees and managers within the workplace.

THE LACK OF COMMITMENT

The general climate in a company with regard to sexual harassment is an important predictor of the extent and intensity with which sexual harassment will occur in the company. Three important characteristics that foster an environment conducive to harassment are: victims' sense that they are at risk if they report an incident, the lack of penalties for perpetrators, and the belief that any reports are not taken seriously into account.

THE CUSTOMER-ORIENTED CHARACTER

Employees who have regular contact with customers and/or whose compensation is directly dependent on customer satisfaction, are more likely to tolerate or avoid reporting problematic behaviour for reasons of financial and job insecurity. In these places, management may also, consciously or unconsciously, be more tolerant of such behaviour, rather than intervening for the benefit of its employees.

THE PERSONAL CHARACTER

In workplaces where certain employees are considered particularly «valuable» to employers - the high-selling executive, the partner - management may appear reluctant to address any harassing behavior on their part, but they may also consider that they are exempt from the restrictions and consequences that apply to other individuals in the workplace.

THE DRESS CODE

Another risk factor in the work environment is the existence of dress codes for female workers, which oblige them to expose their silhouette, breasts or legs.

CONSUMPTION OF ALCOHOL

In environments where alcohol consumption during or immediately before and after working hours is considered part of the job, the chances of harassing behaviour are higher, as alcohol reduces social inhibitions and adversely affects judgement.

FOR INDIVIDUALS

The majority of individuals who are victims of sexual harassment are, as already mentioned, women, not excluding, of course, the percentage of men and/or persons of indeterminate gender. Some other characteristics that also influence the likelihood of suffering sexual harassment or violence are:

AGE

Young people (18-29 years old), as perpetrators of sexual harassment, lack the maturity that would allow them to realize the consequences of their behavior, while as victims they often lack the self-confidence that would allow them to ward off unwanted advances or set limits to behaviors they consider offensive. Finally, their young age usually places them in positions of limited authority, job security and economic power, thus making them more vulnerable to manipulation attempts.

MINORITY BACKGROUND

Members of minority groups (racial, ethnic, religious, etc. as well as people with disabilities) report higher levels of harassment. And women belonging to a minority group are more likely to be sexually harassed compared to both men belonging to the same minority group and women not belonging to the same minority group. This may partly be due to the fact that women from ethnic minorities are often employed in the most marginalised and vulnerable jobs in the labour market.

EMPLOYMENT STATUS

Women with irregular or precarious employment contracts are more exposed to sexual harassment. Women with open-ended contracts report lower rates of sexual harassment compared to those working on temporary or fixed-term contracts.

2. PREVENTION

Preventing incidents of sexual harassment is far preferable over responding to incidents, which is why the risk assessment process is so important. Apart from the efforts to eliminate specific risks, it is particularly important, on a horizontal basis, that management is committed to combating harassment and that clear rules are formulated and implemented regarding the behaviour of any individual who comes into contact with the organisation.

COMMITMENT

The key objective of management's active commitment is to establish a culture of zero tolerance towards sexual harassment. This commitment must be communicated to all individuals and groups involved in the operation of the business; at the same time, however, it is important that it is also put into practice through prompt and effective handling of any arising complaint and support for the victims.

In the context of prevention, the policy developed specifically for matters of sexual harassment and violence should include:

- 1. SET OF OPTIONS FOR REPORTING SEXUAL HARASSMENT.** For example, these options could be: reporting to the manager, reporting to the Human Resources department, reporting via an anonymous hotline or complaints platform, reporting to a special committee set up specifically for this reason.
- 2. A SET OF INDICATIVE SANCTIONS FOR HARASSERS,** as well as the measures taken to protect the victim until his/her report is fully investigated.
- 3. THE PROCEDURE FOR HANDLING COMPLAINTS OF SEXUAL HARASSMENT** filed to the Labour Inspectorate.
- 4. SUPPORT MEASURES OFFERED TO INDIVIDUALS INVOLVED IN A COMPLAINT** (specialist psychological support helplines, paid leave for individuals experiencing health problems as a result of harassment, etc.).

Make sure that all other company policies (for example, policies on the use of social media, whistleblowing, company dress code, privacy, etc.) are in line with the above. For example, the company's social media policy should also make clear its zero tolerance to sexual harassment at work.

Regular reassessment of your policy, through data collection and surveys among staff, is also important. If the data coming into your hands show that sexual harassment continues to be a problem, even after you have taken steps to prevent it, you should look for the reasons why the steps you have taken didn't work and consider changing something in the content of the policy or its implementation.

One reason why these policies may not achieve their objective is the fact that the different stakeholders are not involved in their elaboration. Remember that any sexual harassment policy should be drawn up in consultation with the relevant trade union or a group of representatives of the company's staff. Customers, suppliers and other individuals who have dealings with the company may also be involved in this process in various ways.

RULES OF CONDUCT

Sexually harassing behaviour, unfortunately, is not an on-off switch, but a range of behaviours that are often difficult to describe, delineate or document. However, there are certain behaviours that need to be established in the workplace and others that need to be eliminated. It is therefore part of the role of management and/or the HR department to create a code that sets the boundaries between desirable and undesirable behaviours. This code should make clear:

- 1. THAT SEXUAL HARASSMENT IS ILLEGAL**
- 2. WHAT IS SEXUAL HARASSMENT AND WHAT BEHAVIOUR IS UNACCEPTABLE** in the workplace and carries sanctions
- 3. THAT STAFF ARE ENCOURAGED TO REPORT SEXUAL HARASSMENT PROMPTLY**, without the risk of facing disciplinary action if their report is not proven to be founded (provided, of course, that such accusation was not malicious).
- 4. THE WAYS IN WHICH EVERY EMPLOYEE CAN HELP** to eliminate the phenomenon.
- 5. THAT COMPLIANCE WITH THIS CODE AND MONITORING OF STAFF COMPLIANCE THERETO IS INCLUDED IN THE EVALUATION CRITERIA** for all managers of the company.

You can read specific examples of desirable and undesirable options in the Guide for workers on preventing and combating sexual harassment and violence at work. Of course, the existence of a code of conduct does not guarantee its observance. Therefore, once it has been drawn up, it is important that its content is communicated frequently and by different means (written, oral, electronic, etc.) to individuals, that team leaders make it a model of behaviour, that it is incorporated into the training received by employees and managers and, of course, that it is regularly re-evaluated.

3. RESPONSE

As we have seen, the policy against sexual harassment and violence in any company should clearly describe the mechanism(s) whereby any person, inside or outside the business, can lodge a relevant report. It should also describe the steps taken by the enterprise following such a report. Below we will discuss in more detail some key points for both procedures.

REPORTING MECHANISM

Any employee or person employed in another relationship who is affected by an incident of violence and harassment against them, even if the relationship under which the incident has allegedly occurred has ended, has the right, in addition to judicial protection, to appeal to the Labour Inspectorate and the Ombudsman in accordance with Law 3896/2010 and Law 4443/2016 on equal treatment.

The affected person also has the right to file a relevant complaint within the enterprise (Art.10, Law 4808/2021), in which case the employer is obliged to take the necessary appropriate measures against the alleged perpetrator (Art. 12, para. 2, N.4808/2021).

It is worth recalling that the new institutional framework (Law 4808/2021, articles 2-23) highlights the primary role of protecting victims, complainants or witnesses from further victimisation or retaliation, thus ensuring access of the affected persons to more effective and secure reporting mechanisms. In particular, it is prohibited and invalid to terminate the contract underpinning the employment, or to treat unfavourably any affected person in any other way, if it constitutes vindictive behaviour, which occurs in response to a complaint, testimony, provision of information or request for legal protection in relation to an incident of violence or harassment (Art. 13, N.4808/2021).

The corporate policy should put in place several mechanisms for receiving complaints (compliance department, HR department, special committee, complaints platform, etc.), which will differ depending on the source of the harassment (e.g. senior manager or external supplier) but also depending on the different temperaments of people, who need to feel comfortable before proceeding to a report.

It is important, among this variety of mechanisms, to provide for the possibility of both named and anonymous reporting. Furthermore, in addition to the internal reception mechanism, there should also be an option for a neutral third party receiving the reports, such as a mediation agency or an expert organisation.

HANDLING OF INCIDENTS

In relation to the handling of complaints, wherever they are filed, it is worth recalling that, in the event of a confirmed breach of the prohibition of violence and harassment at work by the employer or if the employer fails to take the necessary measures, the employer is subject to the administrative sanctions under Article 19 para. 2 of Law 4808/2021. As an employer, you must:

- Take any complaint for sexual harassment very seriously
- Make sure that all complaints are handled fairly and with sensitivity to the individuals involved, in accordance with the relevant procedures
- Describe to all persons involved the investigation and settlement process that will be followed
- Ensure the greatest possible speed in handling each report

Any affected person, if they have reasonable grounds to believe that, during the investigation of their complaint, there is an imminent serious risk to their life, health or safety, have the right to leave the workplace for a reasonable period of time without loss of pay or other adverse consequences, provided that they inform the employer in writing in advance, stating the incident of violence and harassment, and the facts justifying their belief.

Not only should you never try to cover up or ignore an allegation of sexual harassment, but you should also never use any confidentiality clauses (NDAs) to prevent a person from reporting an incident. How you communicate with the individuals who have filed a report is also particularly important, as there are phrases and approaches that will make things harder rather than easier.

FOR EXAMPLE:

Do not tell the person making the report that the process may be long and tough, nor ask them if they are sure they want to go ahead. This may be perceived as an attempt to persuade them not to continue the process. Also, do not say that the incident reported by a worker was not that serious - do acknowledge that reporting it means it is serious. A behaviour that you do not consider offensive or unwelcome may have a very different effect on another person. Furthermore, it doesn't help to question a complaint for sexual harassment simply because it happened away from other people or because no one else saw it.

Even if you happen to be friends with the person accused of sexual harassment or believe in their innocence, this should not affect the way you handle the incident.

In some cases, you may only have the word of the person making the complaint against the word of the accused person - for example, if the incident happened out of sight of other people or no one saw it. Having heard the evidence from both sides, as part of a fair process, you can still decide that the case is valid if you believe the person who made the complaint.

The principle of reversed burden of proof is important here: when the affected person invokes facts or evidence suggesting that an incident of violence or harassment occurred, then the alleged perpetrator is required to bear the burden of proving their innocence in court or before a competent administrative authority.

The formal procedure to be outlined in the policy and implemented, should ideally allow for:

- both the complainant and the person against whom the complaint is made, to be accompanied by a trade union representative or a colleague throughout the process of investigating the report, if they submit a reasonable request
- both the complainant and the person against whom the complaint is made, to seek advice from somebody who has been specially trained to deal with allegations of sexual harassment
- the right to appeal against a judgment, after the investigation of the complaint and the examination of all evidence

The Labour Inspectorate proposes four interim measures in case of imminent risk, which can be imposed at any stage of a labour dispute resolution or investigation of an incident and can be lifted or maintained based on the conclusion of the investigation or upon decision of the Labour Inspector. The interim measures shall be applied until it is proven that the imminent risk has ceased to exist and shall consist in:

- a) removing the complainant from the workplace with full pay,
- b) changing the staff shifts,
- c) moving the complainant to another work section,
- d) allowing the complainant to work remotely, depending on the nature of the duties.

However, you should not move the person who has been sexually harassed to a different part of the organization while you are handling their complaint, unless they have asked to be moved. Such a relocation, if not requested, may be considered vindictive behavior.

During the investigation of a complaint, and even afterwards, it is important to provide active support to the complainant, so that they can cope with both the emotional burden of the process and the incident that preceded it.

For example, the individual who makes the complaint may worry that they:

- won't be taken seriously
- will have to confront the harasser face to face
- will be asked about their personal life
- will find themselves exposed to other people in the workplace

The first necessary step is to reassure them that none of these will happen.

For this reassurance to be accurate, you must ensure that:

- the person feels safe and protected
- they have access to psychological support, for example through an employee assistance programme (EAP), if you have one
- you talk to them privately, taking enough time to listen to them
- the person(s) investigating the allegation is/are impartial and trained for the role

Similar support should be provided to the person who has been accused of sexual harassment.

This person may worry that:

- what they say will not be taken seriously
- they may have to confront the person who made the report
- they will be asked details about their personal life
- they will find themselves unfairly exposed to other people in the workplace

The first essential step here, too, is to reassure them that none of these will happen.

For this reassurance to be accurate, you must ensure that:

- you offer that person the same kind of support you would give to someone who has made a report
- you talk to them privately, taking enough time to listen to them
- they have access to a psychological support service
- the person(s) investigating the allegation is/are impartial and trained for the role

It goes without saying that the investigation of any report should remain as confidential as possible.

The information you share should only reach the people who need to know it, for example:

- The person who made the complaint and their representative
- The person accused of sexual harassment and their lawyer
- The close family of the complainant and the accused
- The person investigating the complaint

The importance of this confidentiality should be explained to everyone from the very start of the process.

Once you have completed a thorough and fair process of examining the complaint, you must decide on the result, including whether or not the complaint will be admitted.

If the complaint is admitted, but you decide not to fire the person who committed the harassment, you should consider taking measures to improve working relations and support the victims.

For example, your options may include one or all of the following:

- counselling
- mediation
- training for the harasser on equality issues
- moving the harasser to another location or role to keep them away from the person they harassed

The above measures often need to be taken even if you decide that sexual harassment is not substantiated, in order to smooth out the working relations between the individuals involved in the complaint.

And, of course, if the complaint is upheld and the harasser is fired, then you should reassess the risks in your company and update your prevention measures, with awareness-raising and training for staff and managers being at the heart of such measures.



4. AWARENESS-RAISING

Awareness-raising and training activities, both for employees and managers, fall mainly under the heading of prevention; however, as we have seen, they are also an important component of incident response, as they highlight the needs and opportunities for further staff development with the aim of eliminating harassment in the workplace.

These actions need to cover two main areas: ongoing and multifaceted education of employees on the policies adopted by the company in relation to sexual harassment, and training of staff in skills and tools that will allow them to contribute to this effort, either as team members, as team leaders, as victims or as witnesses of harassment incidents.

POLICY COMMUNICATION

The Communication of the existing or new corporate policy should be carried out regularly and, ideally, through more than one channel, so as to cover the needs and preferences of as large a part of the staff as possible. Some examples of such channels are:

- corporate events
- the company's intranet
- the company's website
- informational videos
- printed brochures
- open discussions and consultations on policy
- posters in different parts of the offices

It is important that this information is always given in simple and understandable language and that it does not stop once a new employee joins the company, but is repeated frequently, even for employees who have been with the company for many years.

TRAINING SEMINARS

Training seminars should address separately the needs of the broad base of workers and of team leaders. They should be repeated at regular intervals, ideally by expert external partners, as part of an interactive process.

In the first case, for employees, the focus of any training needs to be: first, the tools for recognising sexual harassment; second, the desirable and undesirable behaviours that individuals display in their communication with each other; and third, the ways in which individuals themselves can intervene if they witness an incident

of sexual harassment. Research shows that this third point is particularly important, as it gives participants the tools to co-create a culture of trust, safety and respect.

In the second case, the company's managers need to be trained in all the above topics, but also in how to encourage the adoption of the desired behaviours by the members of their teams, how to act as role models for the people around them and how to handle, as leaders, any challenging behaviours.

In recent years there has been a strong trend for such training to be conducted through ready-made webinars, for reasons related to saving time and money on the part of both the business and the employees. Unfortunately or fortunately, the subject of sexual harassment touches on deep-rooted stereotypes, resistances and attitudes; precisely for this reason, it is important to approach it in a safe context of interaction, open communication and honest exchange, so that it loses the character of a punitive lecture and becomes an opportunity for creative fermentation that will allow individuals to truly build more meaningful and functional relationships with each other.

MYTHS AND TRUTHS ABOUT SEXUAL HARASSMENT

The following myths are often deep-rooted beliefs that need to be reconsidered if we are to make a meaningful contribution to tackling sexual harassment at work.

**ALL THESE RULES
MEAN THAT
WE CAN'T EVEN
MAKE A JOKE
ANYMORE.**

No, they just mean that we should pay more attention to the kind of humor we choose when we are with people who are doing their job. Humor is essential for building healthy and harmonious relationships with people we work with, but in fact jokes with sexual content or innuendos have no place in the workplace. When sharing such a 'joke', it is very easy to offend, even unintentionally, one or more people around you; instead, you could laugh and come closer in a whole host of other, safer and more inclusive ways.

**WOMEN ARE
TOO SENSITIVE,
SO THEY VIEW ANYTHING
THAT HAPPENS AS
HARASSMENT.**

This myth arises from the fact that, over the years, we do realise that certain behaviours that were once considered socially acceptable are no longer so. But this is not over-sensitivity, it is a social change that affects us all. How can we adapt to the new codes of communication? First of all, we need to practice recognising the 'signals' given by the people around us. We also need to be willing to listen to any feedback we may receive about our problematic behaviour. If we have doubts about what we are allowed or not allowed to say or do, it would be good to:

- a) ask,
- b) choose the safer version («your hairstyle is very nice» instead of «you're breaking hearts with this hairstyle») and/or
- c) reflect on how we would feel if somebody treated a person close to us in one way or another.

**THE WAY THINGS
HAVE TURNED OUT,
IT'S VERY LIKELY,
AS A MAN, TO BE
FALSELY ACCUSED
OF SEXUAL
HARASSMENT.**

**WITH ALL THAT, WE ARE
NOT ALLOWED TO FLIRT
IN THE WORKPLACE ANY
MORE.**

False allegations of sexual harassment are extremely rare (only 1.5% of the reports worldwide). It is very hard for any person, either a woman or a man, to embark on the process of making a complaint, which almost always involves risk and psychological costs, unless something has actually happened that has offended their dignity or makes their daily life and work difficult. In any case, this is why it is important for companies to design and implement effective mechanisms for handling and investigating any complaint, thus ensuring protection and fair treatment of any person involved.

Consensual flirting is not sexual harassment. However, in order to be able to flirt respectfully and safely, we have to make sure that the person we are flirting with is willingly participating in the process. If we meet resistance, verbal or non-verbal, at our first approach, we should immediately stop. Moreover, even before we make a compliment or a sexual advance to someone we are working with, it is important to make sure that they have the ability to say «no». If this person is in a far lower position than ours, or if their working conditions are precarious, or if they are particularly vulnerable because of age, disability or because they belong to a minority group, then we should be even more careful in our approach so that we do not, unintentionally, exert any pressure that may eventually turn our courtship into harassing behaviour.

More myths and truths about sexual harassment & violence at work [here](#).

USEFUL LINKS

[Labour Inspectorate](#)

[ACAS](#)

[Survey of Action Aid Hellas](#)

USEFUL TOOLS

[Corporate sexual harassment & violence self-assessment tool](#)

[Policy Template](#)

SAFE AT WORK

TO PREVENT
AND COMBAT
SEXUAL HARASSMENT
AND VIOLENCE
AT WORK

**TRAINING
MANUAL
FOR HR STAFF**