Benchmark study on measures relating to harassment prevention

European Commission May 2021



INTRODUCTION OBJECTIVES AND SCOPE OF THE STUDY

INTRODUCTION



Context

The European Commission has at its disposal a robust and comprehensive harassment prevention policy, which is to be revised in the course of 2021-2022 with the aim to strengthen its commitment to a work environment that is respectful and free of harassment. One of the elements required to achieve this will consist of a comprehensive strategy on harassment prevention that will put emphasis on awareness raising and will include a multi-disciplinary approach to harassment prevention. This strategy will, among other things, be based on the results of a dedicated benchmark study on harassment prevention measures across EU and international organisations described in this document.

Objectives

In order to ensure the objectiveness of the Commission harassment prevention policy, the Commission has envisioned to benchmark its proposed measures with the current practices of comparable organisations (EU and international).

The objectives of the current study include:

- Providing an **independent and objective comparison** of harassment prevention measures established in various EU institutions and other organisations;
- Identifying and collecting the best practices followed by the participating organisations;
- Supporting the participating organisations in assessing their level of progress towards the goal of creating and maintaining respectful and free of harassment work environment.

Content of the study

The scope and the basis of this benchmark study is a qualitative response of selected, comparable EU and international institutions to a structured questionnaire.

The **questionnaire consists of 14 questions** (please see Annex 1) related to harassment prevention measures, accompanying measures, resources assigned to handle harassment, etc.

The following organisations have been surveyed:















European External Action Service

European Court of Auditors

European Parliament

European Central Bank

Court of Justice

European Commission

International Organisations



North-Atlantic Treaty Organisation



United Nations



The World Bank

To efficiently compare the participating organisations, a **harassment prevention maturity model** was developed, with a set of dimensions to be evaluated. Each of the dimensions is supported by several criteria, noting the most crucial aspects. This allowed an **objective and independent qualitative assessment** of how each organisation currently tackles each of the dimensions of the model.

Furthermore, the maturity model uses a quantitative score which directly allows **comparison between organisations** whether it is per dimension or on a aggregated basis. The methodology used to develop the model will be further detailed in the *Methodology* section of this document.

The study provides the results of this analysis on an aggregated level, comparing organisations based on their results per dimension as well as the detailed analysis of the responses per dimension. A **summary of similarities, differences and best practices** among the measures taken by the participating organisations is identified.

Finally, the study provides general recommendations to the organisations wishing to improve their score and **enhance their current maturity level** and provide more tools and mechanisms to prevent harassment and create a respectful work environment. The recommendations are based on the identified best practices of the participating organisations, including many of the Commission.

As a result of this study, the Commission will be able to compare its own performance in relation to each of the dimensions to other EU and international organisations practices.

METHODOLOGY MATURITY MODEL

MATURITY MODEL



Dimensions

In the questionnaire responses provided by the participating organisations, the following **dimension** were evaluated:

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	Definition	clear explanation of types and forms of harassment
	Prevention Policy	written description of the principles and a course of action for an organisation to minimise the risk of harassment occurring
(Ç)	Redress mechanism	procedures to prevent the harassment occurring and apply appropriate measures (for victim and harasser)
	Accompanying measures	measures available to support the victim in re-establishing and maintaining a healthy working environment
ÄÄÄ	Resources	number and types of staff involved in harassment prevention procedures (formal or informal)
	Reporting & Metrics Communication	types and frequency of data collection; reporting on the harassment occurrences and communication to staff on outcomes
	Awareness & Training	critical capacity building tools to ensure understanding of the desired conduct at work
	Leadership involvement	endorsement and promotion of ethical structures and behaviours for safe & respectful workplace conduct through leadership

Each of the dimensions is supported by a set of criteria, formulated in a form of statements, e.g., Definition of harassment present, Definition of harassment clearly differentiates between psychological and sexual harassment. The list of the criteria is listed in the dimension analysis pages.

During the qualitative analysis of the responses, each of the participating organisations was evaluated on the criteria – whether sufficient information was provided in the questionnaire, and therefore the criterion has been met.

Levels of maturity

The harassment prevention maturity model is based on four levels with an increasing advancement of the criteria, across various dimensions. The list of criteria per level can be found in Annex 2. The maturity model was developed specifically for the purposes of this study and is based on the methodology of Bersin's Diversity and Inclusion maturity model. Nevertheless, all criteria were set up specifically for the purpose of this study, based on the responses of the participating organisations. Similarly, the selection of criteria for the maturity levels was driven by the Bersin model and the responses of the organisations.

Organisations increase data collection efforts to draw conclusions and action plans, **LEVEL 4: INTEGRATED** adapting to emerging needs of the staff Organisations expand their communication and data collection efforts; Leadership plays an **LEVEL 3: COMMITTED** important role in conflict resolution, follow-up and communication Organisations expand their prevention policy in scope, providing clear lists of prohibited **LEVEL 2: RESPONSIVE** behaviours, including various types of staff, and providing training and awareness raising tools Organisations focus on meeting legal or minimum requirements, e.g., defining LEVEL 1: COMPLIANCE-FOCUSED harassment, providing a prevention policy, redress mechanisms and some

Limitation to the study

accompanying measures

- (1) This study is based on self-reported information, partially supported by documentation shared by the participating organisations.
- (2) The answers provided by the organisations were varied in terms of exhaustiveness. In order to ensure best quality of the analysis a mitigation action was undertaken. Namely, after initial assessment, the results were shared with the organisations to consult their initial evaluation (based on the responses provided). The organisations were invited to provide clarification or comments that were then added to the analysis.

BENCHMARK STUDY HIGH-LEVEL FINDINGS

HIGH-LEVEL OVERVIEW



General maturity assessment

The analysis of the responses showed a varied maturity level across the participating organisations.

It was noted that all organisations meet the vast majority of Level 1 criteria, which focus on providing a clear definition of what constitutes harassment, a prevention policy. However still lack more elaborate and comprehensive processes and procedures in terms of redress mechanisms, accompanying measures as well as a structured approach to awareness raising, training and leadership involvement. It was also observed that over 80% of the organisations met over 60% of the criteria of level 2.

One third of the organisations can be placed close to or between levels 2 and 3, where significant efforts were observed in the dimensions of *Prevention Policy, Awareness & Training* and some of the criteria of the *Leadership Involvement*.

The vast majority of the organisations can be placed between Levels 3 and 4, where the leadership activities initiatives as well as training and communication take more elaborate and engaging forms. Although some efforts are already under way, about half of the organisations have met a number of the criteria of Level 4. In section *Key recommendations*, a list of actions is included to support organisations in progressing towards higher levels of maturity in their harassment prevention.

While this assessment gives an indicative notion of the maturity level of the participating organisations, it should be noted that the assessment was based on the answers provided to the questionnaire and the supporting documentation, such as staff survey questionnaires, policy documentation, etc. Therefore, the results of this assessment should be used as a self-check tool and the best practices noted in the next pages of the report can serve as guidance and inspiration for further improvements of the harassment prevention practices.

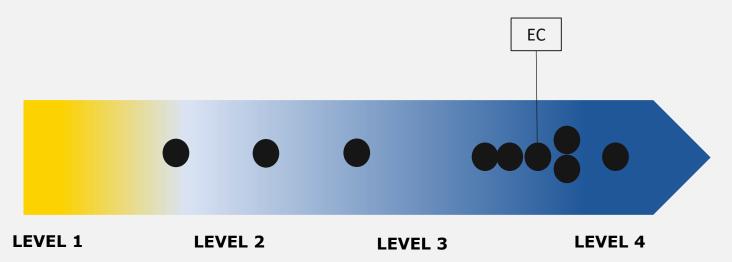


Fig. 1 – Maturity assessment of the participating organisations

Comparison across dimensions

The two dimensions where most of the criteria are met are "Definition" and "Resources". This implies that the majority of the participating organisations holistically define harassment at work and have the appropriate resources to address harassment cases and provide support to the victims.

On the other hand, the two dimensions where the least of criteria are met include the "Accompanying measures" and the "Reporting & Metrics Communication". This indicates that some of the participating organisations could further improve the mechanism in place to provide the victims with support to help them recover, such as measures to manage the work schedule and performance, or re-establish trust. In terms of reporting, some of organisations can further work on collecting data, drawing conclusions and setting up action plans as well as establishing transparent communication to staff.

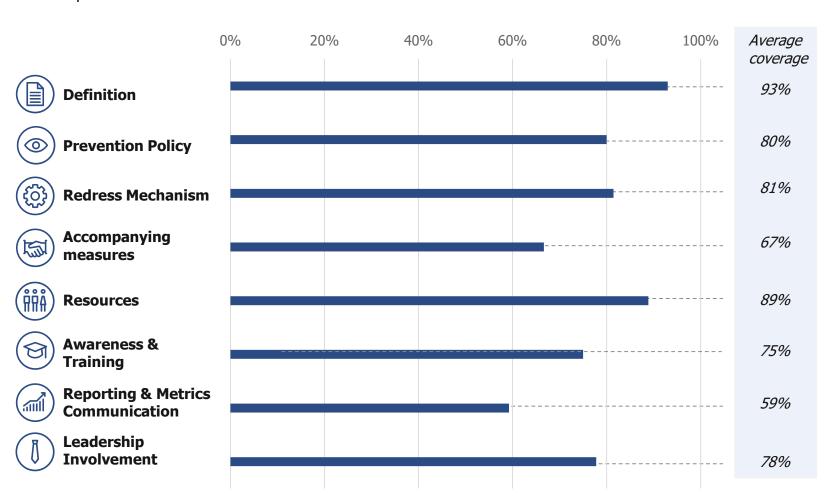


Fig. 2 – Aggregated assessment results per dimension

BENCHMARK STUDY FINDINGS PER DIMENSION

DEFINITION OF HARASSMENT



Scope

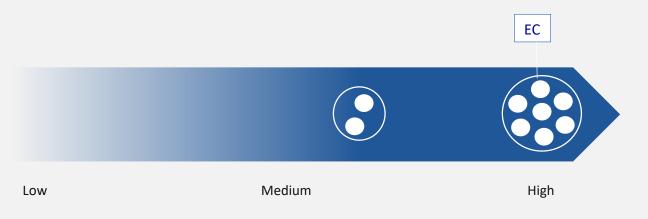
The **Definition** dimension refers to the presence or the absence of a clear explanation of the different forms psychological and sexual harassment at work can take. Its objective is to establish clear boundaries between what is acceptable and what is not. The presence of a clear definition of harassment is essential to establish a dialogue or facilitate potential investigations.

As a reminder, the **criteria evaluated** during the study are:

- Definition of harassment present
- Definition differentiates between sexual and psychological harassment
- The organisation provides a list of the different forms sexual and psychological harassment can take

Coverage of the Criteria

Coverage of the dimension across organisations: The majority of organisations covers 100% of the criteria used while the others cover two thirds of these.



Similarities

It appears that all of the organisations have a clear explanation of what is psychological and sexual harassment at work and distinguishes between these two.

The vast majority of the organisations fulfil all three criteria of this dimension. This suggests that the definition is most of the time well-established within the participating organisations and serve as a basis to define what can be considered as harassment. These types of definition are usually provided in the documents related to ethics and harassment prevention available to staff such as code of conduct, staff rules, respect toolkit, brochure, etc.

Differences

While some of the organisations already provide a list of the different forms that sexual and psychological harassment can take, others do not specify which type of behaviours can be associated with harassment at work.

As a result, the main difference between the participating organisations consist of making a list of examples of psychological and sexual harassment available to the staff. For instance, psychological harassment can go from over-surveillance to written or physical intimidation. Explicitly listing these examples allow to set a common language which can later be used to assess whether or not a specific situation can be associated with harassment.

Best Practices

The following best practices were noted in various participating organisations:

- The presence of examples of prohibited behaviours, whether these are associated with psychological or sexual harassment including respectively:
 - Inappropriate comments, intimidation, insults, threats (oral and written), exclusion/rejection and isolation, over-surveillance, false accusations, belittling a staff members' contribution, setting unrealistic working objectives, not giving someone any work or systematically giving them work.
 - Promises of reward in return for sexual favours, repeated overblown compliments, repeated coarse or suggestive remarks
 or sexual innuendo, physical contact, voyeurism, exhibitionism, use of pornographic material, obscene language or
 gestures.
- The inclusion of cyber/online harassment since this type of harassment becomes more present with virtual working arrangements.

PREVENTION POLICY



Scope

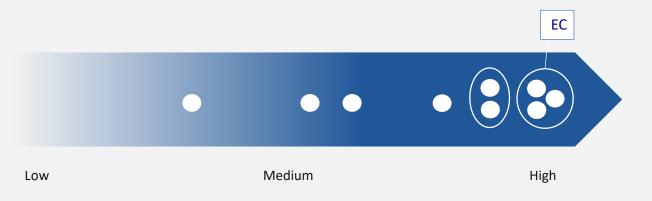
The **Prevention Policy** dimension refers to the presence or the absence of a written description of the principles underlying harassment prevention at work and a course of action for an organisation to minimise the risk of harassment occurring.

As a reminder, the criteria evaluated during the study are:

- Prevention Policy present in the organisation
- Prevention Policy clearly states the scope
- The organisation outlines everyone's roles and responsibilities
- There is assistance to staff in finding effective ways to handle harassment by pointing them to the right direction and to the right procedures
- Prevention Policy covers contract staff
- Prevention Policy covers all categories of staff
- Prevention Policy is publicly available
- Prevention Policy is available to all staff
- The harassment prevention policy is integrated into other policies/ procedures
- · Harassment prevention policy is regularly evaluated
- Harassment prevention policy is evaluated internally and/or externally

Coverage of the Criteria

Coverage of the dimension across organisations: Most of the organisations cover at least 50% of the criteria, and there is only one that does not fulfil the majority of the criteria.



Please note that the maturity levels are assigned only at the aggregated level of all dimensions.

Similarities

All of them allow their staff to have access to their harassment prevention policy or the rules related to harassment prevention. For the participating organisations that have a prevention policy independent from other "Diversity & Ethics policies", all of them integrated their harassment prevention policy into other procedures, often the induction/career training. Their prevention policy usually covers all categories of staff in the organisation.

The criteria that most organisations do not meet are the availability of their harassment prevention policy to the public, the presence of a clear explanation of the policy's scope and the presence of a regular (internal or external) evaluation of such policy. Even among the organisations that do review their harassment prevention policy, only one of them review it externally.

Finally, most organisations point staff in the right direction to help them find assistance to handle harassment.

Differences

A third of the participating organisations do not state the scope of their harassment prevention policy and, among these organisations, one out of three do not have an independent harassment prevention policy.

As mentioned above, one other point of difference is the availability of such policy to the public (when relevant). Again, a third of the participating organisations do not make their set of rules concerning harassment available to the public. There is no correlation between the organisations that do make their prevention policy publicly available and those who regularly evaluate this policy.

Finally, a few of the participating organisations do not outline the roles and responsibilities of their staff involved in the policy while, for a few others, their prevention policy do no cover all categories of staff which sometimes might leave subcontractors or trainees defenceless if faced with an harassment case.

Best Practices

The following best practices were noted at various participating organisations:

- The coverage of all categories of staff by the prevention policy including:
 - Temporary staff
 - Consultants
 - Subcontractors
 - Trainees
- Such policy is clearly stated and can be easily found instead of spreading its content over several documents, codes, etc.
- The harassment prevention policy is externally reviewed and an action plan is drawn up based on the feedback provided.
- The inclusion of harassment prevention in risk management along with mitigation actions to be taken in order to prevent harassment from happening and/or to estimate its impact on the organisation's activities.
- The harassment prevention policy clearly states the roles and responsibilities of all categories of staff including leaders, counsellors and mediators (if applicable).

REDRESS MECHANISM



Scope

The **Redress Mechanism** dimension refers to the presence or the absence of procedures to prevent harassment occurring and to apply appropriate measures both for the victim and the person accused of harassment.

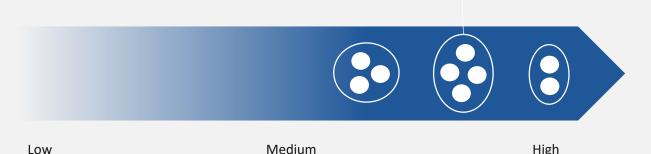
As a reminder, the criteria evaluated during the study are:

- Informal procedures (e.g. helpline, mediation service, confidential counsellors) for addressing allegations of harassment are available
- Formal procedures for addressing allegations of harassment are available (e.g. complaint mechanism)
- External resources are used to mediate in cases of conflict or to evaluate cases of potential harassment (external mediation service)
- Duration of the mandate of confidential counsellors/mediators is limited in time
- Network of counsellors and/or mediators is at the disposal of staff
- Relationship between formal and informal procedures is straightforward (e.g. Formal and informal procedures can be launched independently of each other and processes are in place to avoid revictimisation)

Coverage of the Criteria

Coverage of the dimension across organisations: All organisations cover at least 50% of the criteria.

EC



Similarities

All of the participating organisations have informal and formal procedures in place, which implies that staff can seek informal help and mediation or staff can start a formal procedure by e.g. launching a formal complaint.

Also for all of the organisations, the relationship between formal and informal procedures is straightforward and the victim almost always has the option to choose one or the other option to resolve the conflict. This means that the victim is not obliged to start an informal procedure first before initiating a formal procedure.

The criteria that is less often met (less than half of the organisations) is the effective use of external resources to mediate some cases or to investigate some harassment cases that have been formally reported. This implies that, for most organisations, the victim cannot benefit from point-of-views and/or support external to the organisation itself.

Differences

Even though all of the organisations provide their staff with at least a network of counsellors that are available to listen and help them in case they are faced with harassment, only some of them have a dedicated mediation service that include a network of mediators.

Furthermore, the duration of their mandate is only limited in time for two thirds of the organisations, considering that for some of them, these counsellors mediators are externals which implies that they do not come from the organisation itself.

Limiting the duration of the mandate of its counsellors and/or mediators has the advantage that these do not hold a specific title in the eyes of staff and they can be replaced regularly depending on the needs of the organisation. This will also limit the potential bias that can be developed over the time in such roles.

Best Practices

The following best practices were noted at various participating organisations:

- The possibility of contracting trained, appointed mediators and/or counsellors;
- The possibility to give counsellors or mediators the rights to intervene or launch intervention on their behalf in specific situations when judged necessary by the counsellors and/or mediators themselves;
- Clearly defining the process to follow in order to open a formal procedure which means the complaint mechanism is set out with a description of the actions the victim can take to launch the formal procedure.
- The introduction of a whistleblowing procedure where the whistle-blower is protected against retaliation. The whistle blower protection can consist of corrective and preventive actions and should apply also when their suspicions or concerns prove to be wrong. This tool may prove useful in case of alleged harassment.

ACCOMPANYING MEASURES



Scope

The **accompanying measures** dimension refers to the presence or the absence of measures available to support the victim in re-establishing and maintaining a healthy working environment.

As a reminder, the criteria evaluated during the study are:

- Psychological and/or medical support is available to the victims
- Disciplinary measures are effectively applied to people found to have engaged in harassment in order to protect and support the victims
- Rehabilitation measures include managing work schedule and performance (e.g. adapting workplans, special leave, performance review – should the case be known, confidentiality aspect)
- Measures to rebuild trust and re-establish and maintain a satisfactory working environment are available
- Compensation or damages are granted to the victims
- Satisfactory results of the informal procedures (e.g. mediation)

Coverage of the Criteria

Coverage of the dimension across organisations: Overall, the organisations cover fewer criteria as compared to other dimensions, with the majority around the 50% threshold or below.



Similarities

For all of the participating organisations it was observed that psychological support is available to the victim either through professional psychologists or through a network of counsellors (cf. Resources).

Also, the vast majority of the organisations apply disciplinary measures to the alleged harasser when necessary in order to protect and support the victims.

For the criteria that are less often met, more than half of the organisations do not measure the results of their informal procedures on harassment prevention and/or mitigation and lack rehabilitation measures including flexibility in terms of work schedule and performance. This implies that, for the victims within most of these organisations, they do not have the possibility to adapt their workplan or take special leave to recover from the damages suffered due to harassment.

Differences

It was observed that one of the differences between the organisations are the presence or the absence of measures to rebuild trust and re-establish a satisfactory working environment. Such measures can include: Training, team building and/or management involvement. Only five out of nine of the participating organisations are implementing this type of measures that aim to rebuild trust between individuals.

Finally, another difference that has been observed is the possibility for the victim to be financially compensated for the damages suffered due to harassment. Only two thirds of the organisations can grant compensations or damages to victims of harassment.

Best Practices

The following best practices were noted at various participating organisations:

- Introduction of an anonymous helpline managed by a mediation service or other counsellors. This type of helpline should aim to provide proximity and empathetic listening to colleagues facing difficulty and distress due to harassment in their working environment. This could constitute the first contact point before entering into any procedure.
- Involvement of management in the measures taken to rebuild trust. This implies that the leaders in charge of the alleged victim should closely monitor the situation to see its evolution and confirm that any form of harassment does not take place again.
- Possibility to take special leave or adapt own workplans after experiencing harassment in order to recover from the damages suffered.
- The immediate separation of the victim and the alleged harasser once a procedure has been engaged in order to protect and support the victim and to avoid any form of intimidation.
- The measurements of the effectiveness of the informal procedures in place through surveying or reporting of the mediators and/or counsellors activity

RESOURCES



Scope

The **Resources** dimension refers to the presence or the absence of staff involved in harassment prevention procedures, both formal or informal ones. Additionally, the number of staff and the type of the posts plays an important role in access to the harassment prevention and accompanying measures.

As a reminder, the **criteria evaluated** during the study are:

- Staff coordinating the harassment prevention policy;
- Confidential counsellors or staff engaged in similar activities;
- Staff members involved in formal procedures;
- Staff in charge of mediation; and
- Staff involved in formal or informal procedures (e.g. mediators or confidential counsellors) receive appropriate training.

Coverage of the Criteria

Coverage of the dimension across organisations: A distribution of answers was observed, with some organisations covering most of the criteria, and others fulfilling the majority of the criteria.



Similarities

During the analysis it was noted that over a half of the respondents fulfilled all of the criteria for the dimension of Resources, having a variety of profiles at the disposal to run and monitor effective implementation of formal and informal procedures. Next to that, over half of the respondents stated that the staff involved in procedures, or mediation have access to training which is provided upon the start of the work and encouraged in an ongoing manner. Moreover, in most organisations staff working as mediators are required to have an appropriate educational background or certification.

Additionally, all of the organisations noted that staff are appointed to work as confidential counsellors or in a similar capacity. This suggests that the informal procedures are well-equipped to be enforced and followed up on.

Differences

It was observed that some organisations lack staff who officially coordinate the harassment prevention policy. This can impact a regular evaluation and revision of the policy on one hand, and a follow-up on monitoring of its effectiveness, on the other.

Moreover, the number of staff involved in the various activities (see criteria on the left) was varied across the organisations – with very limited number of staff serving as counsellors and mediators, as well as limited number of legal advisers or officers to support claims, complaint mechanisms and disciplinary measures, versus broader networks of staff that are trained and serve as a peer counsellor in the organisation. In case of formal procedures, a broad variety of profiles was noted, ranging from legal, high-level leadership, HR, audit, through administration.

Best Practices

The following best practices were noted at various participating organisations:

- Providing a broad variety of staff that are well trained and with sufficient experience to handle harassment cases offers more
 options to the victims and can increase the trust in the procedures. Some organisations include assessments for their counsellors
 before they are appointed.
- A broad network of staff across the organisational units and hierarchical levels to support the staff in identifying the best options to handle their potential harassment cases;
- Access to external resources for mediation;
- Advisory bodies to support more complex cases and provide guidance on harassment prevention;
- Coordination hub can serve as a central point for the administration, provide guidance to staff on possible option and follow up on the logged cases.
- Staff are appointed to support a confidential helpline.

AWARENESS AND TRAINING



Scope

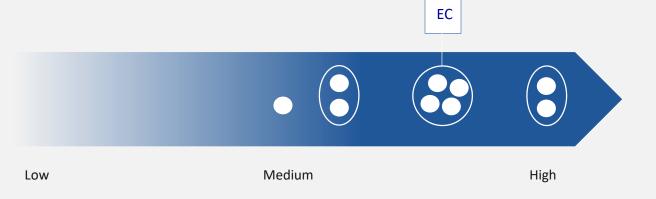
The **Awareness and Training** dimension refers to the presence or the absence of critical capacity building tools to ensure understanding of the desired as well as prohibited conduct at work. This includes training available to staff at various levels (mandatory or optional, communication initiatives, incorporation of additional tools, such as codes of ethics, etc.).

As a reminder, the criteria evaluated during the study are:

- (Mandatory/Optional) Induction training concerning harassment prevention for all staff.;
- (Mandatory/Optional) Career-long training concerning harassment prevention for all staff;
- Regular communication on harassment prevention topics to all staff;
- Internal webpage available to all staff where information on anti-harassment policy, sanctions and procedures is gathered and can be found in one place;
- Additional tools, such as a code of conduct, code of ethics, or guidelines are available to all staff;
- Specific measures designed for promotion of a respectful work environment in virtual work arrangements.

Coverage of the Criteria

Coverage of the dimension across organisations: Overall, there is a large distribution in terms of answers provided by the organisations, however, all seem to cover at least 50% of the criteria.



Similarities

During the analysis it was noted all of the organisations include harassment prevention topics in the induction training, with a vast majority making it an obligatory training to follow. This indicates that for most organisations, the desired and the prohibited behaviours are explained from the start, setting the tone for the collaboration in a positive and respectful workplace.

Tools such as Code of Conduct, Code of Ethics, Guides and guidelines documents are widely accessible across the majority of organisation. Similarly, for most organisations there is an internal webpage set up, e.g. intranet site, where all information with regards to the harassment prevention policy, applicable tools, resources and procedures can be found.

It was also observed that a minority of the organisations has adapted the practices for awareness raising, promoting a respectful environment during the pandemic crisis and shift to virtual collaboration.

Differences

It was observed that in case of career-long, continuous training, the topics of the harassment are included to a various extent: in some cases the topics were not present at all, in some cases made optional and only one-third of the organisations made them obligatory.

In terms of communication, certain efforts such as newsletter, messages from the leadership were undertaken, however, for some organisations on more ad-hoc basis rather than in a structured way.

Best Practices

The following best practices were noted at various participating organisations:

- Training for supervisors, managers for conflict resolution offered in a more interactive, workshop-format.
- Training is offered on regular basis, both self-paced and synchronous, facilitated sessions. Within EU: training offered through the EU Learn platform, or through third-party learning platforms to broaden the scope of topics.
- Training offer is evaluated on a regular basis and updated to address any emerging types of behaviour (e.g. in remote work).
- Visual tools and guides make the content more appealing and easier to comprehend for all staff of various backgrounds in an international environment.
- Communication tools, such as internal webpage or blog are updated regularly and notifications or newsletters are sent out to the staff. In some cases, a communication campaign was launched to create a momentum and raise awareness across the organisation.
- Make harassment prevention part of an open communication in meetings rather than a topic to avoid.
- Virtual safe spaces were organised for remote working arrangements, helping staff to come forward with issues.

REPORTING & METRICS COMMUNICATION



Scope

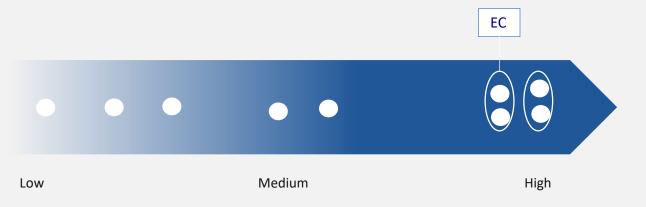
The **Reporting & Metrics Communication** dimension refers to the types and frequency of data collected about the harassment prevention or occurrences. This also involves the reporting and communication on outcomes: to the leadership, specific functions and the staff in general.

As a reminder, the criteria evaluated during the study are:

- Data on the harassment cases is collected;
- Data on the harassment cases is reported to the leadership;
- Data on harassment cases is published and made available to all staff;
- Conclusions or action plans are drawn from the collected data;
- Regular/Periodic surveys are launched to measure staff's perception on the effectiveness of the harassment prevention measures;
- The surveys results are shared and made available to staff.

Coverage of the Criteria

Coverage of the dimension across organisations: A large distribution of answers was observed, with some organisations covering most of the criteria, and others not fulfilling the vast majority of the criteria.



Please note that the maturity levels are assigned only at the aggregated level of all dimensions.

Similarities

Most of the organisations noted that the data on the harassment cases was collected and used for statistical purposes. It can be concluded that the data is used to observe the as-is situation with regards to the type, number and status of the harassment cases.

Apart from this criteria, the responses to the dimension are more differentiated than for other areas.

Differences

During the analysis it was observed that the organisations seem to report on various levels of detail with regards to the harassment cases as well as to various audiences. Those organisations that report the data in general, noted that they report both to the leadership as well as to the staff. The data is anonymised and included into e.g. annual or quarterly reports – however, less than half of the respondents indicated this practice. While the organisations collect and report out, only a minority create action plans, including e.g. awareness raising or communication actions, to address any issues that the statistical data might be indicating.

Similarly, in case of staff surveys, less than a half of the participating organisations launched such input gathering opportunities to the staff members to measure their perception of the offered prevention measures and mechanisms. Those organisations indicated that the questions related to the harassment prevention or occurrence are integrated into larger surveys, e.g. on Diversity and Inclusion, staff well-being or engagement. Nevertheless, the results of the surveys are largely not disclosed to the staff members.

Best Practices

The following best practices were noted at various participating organisations:

- To increase the transparency and trust across the organisation, data on harassment cases is published and updated regularly on an internal website. Data reported also indicates the number of cases closed in a satisfactory manner, especially for the victim.
- Organisations stress the importance of confidentiality in the reporting of the data and following of the GDPR rules for the data privacy aspects.
- Regular pulse-checks as well as a more detailed surveys are launched to the staff to gauge the perceptions, identify any potential
 issues that remain unreported though formal/informal procedures, check the awareness of staff with regards to harassment
 prevention and available procedures.
- While it is recommended to integrate the questions on sexual/psychological harassment into respectful work environment, Diversity and Inclusion topics they should be clearly explained and contextualised to create a safe environment to respond to the questions.
- Staff survey data is reported in an aggregated format to provide a snapshot of the organisation, creating transparency for all
 actors.

LEADERSHIP INVOLVEMENT



Scope

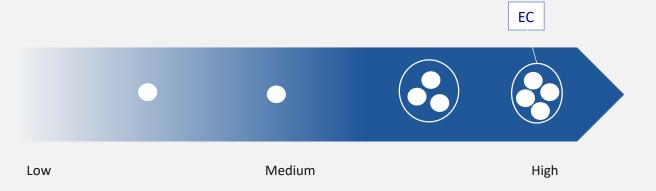
The **Leadership Involvement** dimension refers to the endorsement and promotion of ethical structures and behaviours for safe and respectful workplace conduct through leadership. This also involves the aspects of equipping the leadership layers with appropriate tools and training so that through their actions and behaviour they can serve as examples in the organisation.

As a reminder, the **criteria evaluated** during the study are:

- Senior Management and Line Managers regularly communicate about the importance of harassment prevention;
- Senior Management and Line Managers play an important role to ensure that the conflict is resolved and to monitor the situation;
- Structured approach to training of Senior Management and Line Managers is in place;
- The role of Senior Management and Line Managers is set out to serve as an example.

Coverage of the Criteria

Coverage of the dimension across organisations: A vast majority of the organisations fulfilled at least half of the criteria within the dimension of Leadership involvement.



Similarities

During the analysis it was noted that for a vast majority of the organisations, the role of the leadership (Senior Management, Middle Management) is described to serve as an example to others in terms of the desired actions and behaviours to promote a respectful work environment.

A vast majority of the organisations have also developed specific manager or leadership training courses on harassment prevention, handling conflict, role of managers in ensuring a respectful workplace, etc. While for most organisations such training would be obligatory for the managers, some organisations still noted an ad-hoc nature of organising those.

A slightly lower number of organisations, however, still more than a half, noted that the role of the managers in conflict resolution was clearly stated. Managers are equipped with information and techniques on how to identify possible conflict, address them and facilitate a discussion to arrive at a satisfactory result.

Differences

More differentiated answers were noted in terms of communication by the leadership. Less than half of the respondents have noted that the management regularly communicates about the importance of harassment prevention. This answer is also in line with the assessment of Dimension 7: Reporting and metric communication, where the majority of the organisations did not communicate back the results of the staff surveys or data (aggregated and anonymised) on the harassment cases. It could be concluded that while the role of the management for most organisations is set out to serve as an example, they might lack more structural efforts and approaches to clearly communicate on the topics of harassment prevention.

Best Practices

The following best practices were noted at various participating organisations:

- Role descriptions state clearly that all layers of management (ranging from Senior Management, Middle Management and Line/Team Managers) are expected to foster an inclusive, respectful workplace that is free of any form of harassment and, by their actions and behaviour, are to set an example for others. While 'setting the tone' at the top levels of the organisations is key, there is a strong need to disseminate the messages to middle- and line management, who have the most direct contact with staff and can directly spot any undesired behaviour and promote (by example) respect.
- Creating a structured approach to communication at organisational level will create the momentum for harassment prevention topics and stress its importance. Some organisations launched campaigns on respectful workplaces topics, including diversity, inclusion and harassment prevention.
- Specific tools were developed to support the managers in their role, e.g. a guide that defines sexual and psychological harassment, explains clearly the actions managers should take.

KEY RECOMMENDATIONS ADVANCING IN PROMOTION OF A RESPECTFUL WORKPLACE

IMPROVING THE PRACTICES OF HARASSMENT PREVENTION



Guidelines to improve organisations' maturity level

From Level 1 to Level 2

- 1. Engage staff in mandatory induction training on harassment prevention to ensure they are aware of the attitude to adopt in case anyone is confronted with a case of harassment at work.
- 2. Clearly define and frame the scope of the harassment prevention policy as well as the roles and responsibilities of everyone involved in its fulfilment. Avoid ambiguity and simplify the related procedures.
- 3. Clearly define the different behaviours that can be associated with harassment in order to avoid ambiguity and the "benefit of the doubt". This should include online harassment as well since this type of harassment becomes more present.
- 4. Provide staff with optional career training and all the information related to anti-harassment policy. This could be done through a dedicated internal webpage or a newsletters with emails regularly sent out.
- 5. Extend the prevention policy to all categories of staff (including subcontractors, consultants and trainees).
- 6. Start outlining the role of senior management as key in fighting harassment at work by training them to serve as role model. To this end, a specific tool such as a guide that provides leadership with the type of actions senior managers can take could be beneficial.

From Level 2 to Level 3

- 1. Encourage senior management to regularly communicate about the importance of harassment prevention. This could be facilitated through the creation of a structured approach to communication on organisational level such as campaigns on respectful workplaces topics.
- 2. Directly report data on harassment cases to the associated leaders in order for them to quickly act upon their resolution (while respecting all confidentiality and privacy requirements).
- Provide staff with mandatory career training on harassment prevention. The purpose of such training would be to act as a regular reminder of the inappropriate behaviours to avoid and could be done in an interactive way by using visual tools and e-learnings on a dedicated platform.
- 4. Grant compensation or damages to the victims of harassment to help them recover.
- Capture staff perception on the effectiveness of the antiharassment policy by launching periodic surveys. This type of survey can be reported in an aggregated format to provide a snapshot of the organisation and create transparency for all actors.

From Level 3 to Level 4

- Draw conclusions and action plans from the data collected on the previous harassment cases as well as the effectiveness of each actions undertaken to prevent harassment.
- 2. Provide rehabilitation measures to victims of harassment including work schedule and performance flexibility such as workplans adaptation, special leave, etc.
- 3. Share the survey results to staff to flag how the majority of colleagues perceive harassment at work and reflect on how their own behaviour could be improved/adapted in relation to harassment at work.
- 4. Measure if the informal procedures in place achieve satisfactory results. For instance, this could be included in the staff surveys but also through interviewing of the confidential counsellors, mediators and victims.

ANNEX

ANNEX 1 - QUESTIONNAIRE



- 1. Definition of psychological harassment and the forms it can take.
- 2. Definition of sexual harassment and the forms it can take.
- 3. Existence of a psychological and sexual harassment prevention policy
 - o Its key elements.
 - Categories of staff covered by the policy.
 - Year of adoption and of a last review, if applicable.
 - o Is it publicly available?
- 4. Existence of (informal and formal) procedures for addressing allegations of harassment and for helping staff in distress.
- 5. Existence and types of rehabilitation or various accompanying measures for victims.
- 6. Is the harassment prevention policy integrated into other policies and procedures, for instance, induction training, leadership development, procurement, risk management and internal control standards, other?
- 7. Ratio of staff members v. all staff (full time equivalent) involved in harassment prevention in the organisation
 - Please make a distinction notably between the following, if applicable:
 - number of staff members coordinating the harassment prevention policy
 - number of confidential counsellors or staff engaged in similar activities
 - number of staff members involved in formal procedures; i.e. legal assistance, disciplinary procedures
 - number of staff in charge of mediation
 - other
- 8. Existence and key elements of selection and training of the confidential counsellors, mediators, and any other staff involved in formal and informal procedures.
- 9. Is the duration of the overall mandate of the confidential counsellors and mediators limited in time? As regards mediators, is there a central service and/or a network of mediators across the organisation?
- 10. Types of awareness raising activities carried out in the organisation:
 - o As regards training offer: target groups, compulsory or optional nature of the training courses, frequency, who delivers them.
 - o Communication actions: type of actions, target groups, key messages, frequency.
 - Role of (top) managers in making clear which behaviours are inacceptable in the workplace.
 - Other best practices, for instance, existence of a code of conduct or charter and level of their endorsement.
- 11. Use (or not) of external resources for supporting informal and/or formal procedures: when, how, contractual aspects.
- 12. Whether, how, which and how often data are collected?
 - o In particular, are there surveys? If yes, could we receive at least the questionnaires if the results cannot be shared?
- 13. Measures aimed at promoting a remote work environment that is respectful and free of harassment.
- 14. How regularly is the harassment prevention policy evaluated? How is it done (in-house or by a consultancy)? Are there indicators (outputs, outcomes) used to measure success?

Dimension	Maturity Criteria	Level
Reporting & Metrics Communication	The surveys results are shared and made available to staff	Level 4
Reporting & Metrics Communication	Conclusions or action plans are drawn from the collected data	Level 4
Reporting & Metrics Communication	Data on harassment cases is published and made available to all staff	Level 4
Awareness & Training	Specific measures designed for promotion of a respectful work environment in virtual work arrangements	Level 4
Accompanying measures	Satisfactory results of the informal procedures (e.g. mediation) are realised	Level 4
Accompanying measures	Measures to rebuild trust and re-establish and maintain a satisfactory working environment are available	Level 4
Accompanying measures	Rehabilitation measures include managing work schedule and performance (e.g. adapting workplans, special leave, performance review - should the case be known, confidentiality aspect)	Level 4
Redress	External resources are used to mediate in cases of conflict or to evaluate cases of potential harassment (external mediation service)	Level 4
Leadership involvement	Senior Management and Line Managers play an important role to ensure that the conflict is resolved and to monitor the situation	Level 3
Leadership involvement	Senior Management and Line Managers regularly communicate about the importance of harassment prevention	Level 3
Reporting & Metrics Communication	Regular/Periodic surveys are launched to measure staff's perception on the effectiveness of the harassment prevention measures	Level 3
Reporting & Metrics Communication	Data on the harassment cases is reported to the leadership	Level 3
Awareness & Training	Regular communication on harassment prevention topics to all staff	Level 3
Awareness & Training	Mandatory Career training concerning harassment prevention for all staff	Level 3
Resources	Staff coordinating the harassment prevention policy	Level 3
Accompanying measures	Compensation or damages are granted to the victims	Level 3
Redress mechanism	Network of counsellors and/or mediators is at the disposal of staff	Level 3
Redress mechanism	Duration of the mandate of confidential counsellors/mediators is limited in time	Level 3
Prevention Policy	Harassment prevention policy is evaluated internally and/or externally	Level 3
Prevention Policy	Harassment prevention policy is regularly evaluated	Level 3
Prevention Policy	Prevention Policy is publicly available	Level 3
Leadership involvement	The role of Senior Management and Line Managers is set out to serve as an example	Level 2
Leadership involvement	Structured approach to training of Senior Management and Line Managers is in place	Level 2
Awareness & Training	Additional tools, such as a code of conduct, code of ethics, or guidelines are available to all staff	Level 2
Awareness & Training	Internal webpage available to all staff where information on anti-harassment policy, sanctions and procedures is gathered and can be found in one place	Level 2
Awareness & Training	Optional career training concerning harassment prevention for all staff	Level 2
Awareness & Training	Mandatory induction training concerning harassment prevention for all staff	Level 2
Resources	Staff are involved in formal/informal procedures (mediators or confidential counsellors) receive appropriate training	Level 2
Resources	Staff are in charge of mediation	Level 2
Redress mechanism	The relationship between formal and informal procedures is straightforward	Level 2
Prevention Policy	Is integrated into other policies/procedures	Level 2
Prevention Policy	Covers all categories of staff (contracts, subcontractors, trainees)	Level 2
Prevention Policy	Assists staff in finding effective ways to handle harassment by pointing people in the right direction	Level 2
Prevention Policy	Organisation outlines roles and responsibilities of staff (all staff, leaders and counsellors/mediators, if applicable)	Level 2
Prevention Policy	The scope of the prevention policy is clearly stated	Level 2
Definition	Organisation provides a list of the different from sexual and psychological harassment can take	Level 2
Reporting & Metrics Communication	Data on the harassment cases is collected	Level 1
Awareness & Training	Optional induction training concerning harassment prevention for all staff.	Level 1
Resources	Staff members are involved in formal procedures	Level 1
Resources	Confidential counsellors or staff are engaged in similar activities	Level 1
Accompanying measures	Disciplinary measures are applied to harasser in order to protect and support the victims	Level 1
Accompanying measures	Psychological support is available to the victims	Level 1
Redress mechanism	Formal procedures for addressing allegations of harassment are available	Level 1
Redress mechanism	Informal procedures (e.g. helpline, mediation service, confidential counsellors) for addressing allegations of harassment are available	Level 1
Prevention Policy	Prevention Policy is available to all staff	Level 1
Prevention Policy	Prevention Policy covers contract staff	Level 1
Prevention Policy	Prevention Policy present in the organisation (or a comparable document)	Level 1
Definition	Definition differentiates between sexual and psychological harassment	Level 1
Definition	Definition of harassment present	Level 1