SLOVAK NATIONAL CENTRE FOR HUMAN RIGHTS

VIOLET

Assessing Measures Against Sexual Harassment at the Workplace

Manual for Employers and Auditors

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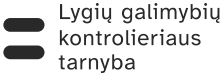

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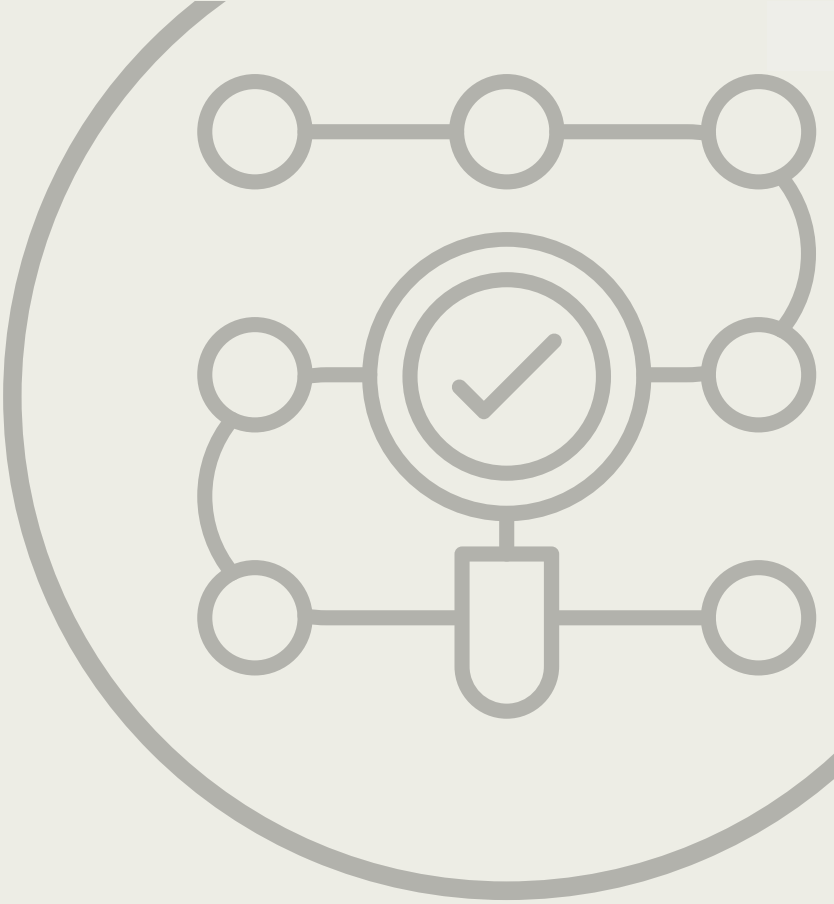


Introduction

The aim of this publication is **to equip employers with a guidance on how to evaluate existing mechanisms for preventing and resolving sexual harassment within an organisation**, and based on these findings, to propose and, ultimately, adopt changes tailored to the needs of the organisation concerned. The manual explains individual steps, what to focus on and what to avoid, the challenges an audit team may face, how to propose changes aimed at achieving sustainable transformation within the organisations and, above all, a respectful and safer working environment. The manual also outlines what tools for preventing and resolving sexual harassment should look like.

The issue of preventing and resolving sexual harassment cases in the workplace touches upon many areas of organisational management and leadership, such as the development and content internal policies, human resources management and employee care, internal communication within the organisation, training and education, of internal values and culture of the organisation, the system for imposing sanctions, taking remedial actions, setting and enforcing boundaries, mutual care, and others.

Employers and organisations as such may engage in audit for various reasons. Their motivation may be in fulfilling legal obligations in the area of preventing and resolving sexual harassment, responding to a particular case of sexual harassment they are currently dealing with or have dealt with recently, or creating favourable working conditions and increasing their attractiveness to employees. In most cases, the audit process will therefore involve constructive cooperation between the audit team and the varius units within the organisation. Occasionally, however, a certain degree of resistance may emerge during the course of the audit (for instance due to some uncomfortable findings, or personal changes within the organisation).

Developed within the framework of the project **VIOLET – Towards Workplaces Without Sexual Harassment and Violence**, this manual builds on the pilot testing of an audit procedure in the area of preventing and resolving sexual harassment implemented in eight healthcare institutions of varying sizes. The pilot testing has enabled us to verify effectiveness of the individual audit steps and identify potential weaknesses. Based on this process, we have been able to outline the challenges faced by the audit team and how we approached them. Throughout the pilot testing, we continuously improved individual audit steps in light of

our experience with the audited organisations. Although the focus was on the healthcare sector, the audit model is applicable to any employer in the public or private sectors.

Methodology of the assessment presented in the manual draws on experience with complex internal processes in large organisations, which typically have greater personnel capacity within departments responsible for preventing and addressing harassment (such as HR departments), as well as more financial and human resources available for developing and implementing internal reporting and response systems for sexual harassment. Nevertheless, all audit steps and the recommended reporting and handling procedures are equally applicable to smaller organisations. These organisations can often implement necessary changes more quickly, for instance due to simpler organisational structure and processes to amend internal policies. In addition, many measures adopted to create respecting and safer working environment do not require significant financial or human resources. In its findings and recommendations, the audit team always reflects the specific capacities of the organisation concerned, sectoral particularities, and other factors, making the manual applicable to any organisation.

The manual consists of five chapters. **Chapter 1** briefly presents the basic principles of participatory audit, the advantages and disadvantages of internal and external audit teams, and the legal regulation of sexual harassment in the Slovak legal system. **Chapter 2** provides an overview of recommended measures in the area of preventing and resolving cases of sexual harassment in the workplace. **Chapter 3** offers guidance on what to focus on when establishing cooperation with the audited organisation. **Chapter 4** describes the individual phases and specific steps of the audit itself (analysis of internal documents; interviews with relevant stakeholders within the organisation; an internal survey; presentation, formulation and implementation of recommendations). This chapter includes an overview of indicators for the prevention and resolution of sexual harassment in the workplace, together with practical guidance on key areas of focus and potential pitfalls to avoid during the audit process. The final chapter, **Chapter 5,** addresses the safety and psychological well-being of the audit team. The publication also includes annexes containing the template for informed consent to participate in interviews, a set of proposed interview questions for relevant stakeholders, and a draft questionnaire for the internal organisational survey.

The subject of the audit are measures related to the **prevention and resolving of sexual harassment in the workplace**. Individual phases of the audit and their components can also be generally applied to unethical behaviour in the workplace, such as other forms of discrimination (e.g. harassment) or bullying. In such cases, it is necessary to modify certain aspects of the audit (Chapter 4), however, the audit process as such and formulation of recommendations aimed at achieving a respectful and safer working environment remain the same.

The publication is intended for **employers and their audit teams**, regardless of whether they are recruited internally or externally. An external audit team refers to experts on sexual harassment who are not in an employment or other similar relation with the audited organisation and who conduct the audit based on a form of cooperation agreement. An internal audit team consists of employees of the audited organisations, for instance from the HR department. Some parts of the publication (e.g. Chapter 4.1) may be more relevant for external audit teams; however, internal auditors might adapt the recommendations to their organisational context.

The manual was developed with an aim to prove useful not only in the context of audits, but also as a source of inspiration and support for employers seeking to create a respectful working environment. Employers will find recommendations and practical steps in the publicationon how to strengthen the prevention of and response to sexual harassment, as well as how to improve procedures for handling individual cases. These measures may be introduced independently of, or prior to, an audit. Employers may also make practical use of the proposed survey designed for the regular monitoring of the prevalence of sexual harassment within their organisation.

1. Definition of key concepts

Measures for preventing and resolving sexual harassment touch upon different areas of organisational management. We have divided the good practice and individual audit steps into five interrelated areas. In order for these measures to function effectively in practice, it is crucial that they are not implemented in isolation, but in combination with other measures relevant for the organisation concerned at a given time. For example, it is not sufficient to adopt an internal policy regulating reporting and handling of sexual harassment cases, but it is essential to also carry out an internal information campaign to ensure that all employees are aware of the policy, include information about the policy and its content in internal training, provide targeted training in managerial skills to all employees involved in reporting and handling mechanisms concerning sexual harassment, and continuously monitor the effectiveness of the system established by the policy through internal surveys among employees of the organisation.

The audit focuses on the following areas:

1. **Training** – regular training for diverse groups of employees on the topic of sexual harassment, including training in relevant managerial skills;
2. **Organisational culture and workplace climate** – the adoption of a zero-tolerance approach to sexual harassment, the prohibition of sexual harassment in a code of conduct or similar policy, internal campaigns on organisational values, and the adoption of other measures aimed at creating a respectful and safer workplace;
3. **Reporting and resolving cases of sexual harassment in the workplace** – the existence of a system for reporting and resolving cases of sexual harassment, which is either a standalone mechanism or a part of a broader system of reporting unethical conduct (e.g. other forms of discrimination or bullying);
4. **Sanctions and remedial actions** – a system for imposing sanctions in cases of sexual harassment and implementation of appropriate remedial actions;
5. **Monitoring** – regular anonymous assessment of the organisational climate in the workplace.

Participatory audit

This publication presents an audit in the area of preventing and resolving cases of sexual harassment in the workplace and the related internal policies, the experiences of employees, management of the organisation, and the state of organisational culture and climate in this area. In conducting the audit, we drew on the principles of participatory gender auditing. These principles include active involvement of employees of the audited organisations in all relevant phases of the audit, as well as the engagement and support of top management to ensure implementation of findings and recommendations resulting from the audit. They also include the use of participatory methods, such as interviews and questionnaires, data-driven analysis (objective data: such as HR data or data contained in internal documents; and subjective data: employees' perception of organisational culture and climate), as well as a focus on both internal and external factors. It is also crucial that the audit leads to concrete action, in other words that the audit report includes concrete measures and steps to be adopted in order to achieve respectful and safer workplace.

The first step prior initiating the audit itself is to create an audit team, establish rules for cooperation among its members, and define the scope and aims of the audit. The main outcome of the audit is the audit report, which includes the findings of the audit, as well as realistic and tangible recommendations for the organisation concerned. A change in the organisation should take place following the audit, however, the audit team does not necessarily have to be involved in this phase. Within the project VIOLET, the audit was followed by an expert cooperation and support in implementation, as well as training for employees (Chapters 4.4 and 4.5).

The key document regulating the procedure, aspects and principles of gender auditing is *Manual for Gender Audit Facilitators - The ILO Participatory Gender Audit Methodology,* which closely elaborates on the abovementioned aspects.[1]

Audit team

In order to ensure the objectivity of the audit process and its results, it is advisable that the audit team comes from an external environment.

1 ILO. A manual for gender audit facilitators: The ILO participatory gender audit methodology, 2nd Edition. Geneva, International Labour Association, 2012. ISBN 978-92-2-126409-5 (print)

However, this manual takes into account that smaller organisations may not have sufficient financial resources to engage an external audit team, and thus also provides a brief framework for functioning of an internal audit team.

External audit team enters the organisation without prior experiences with the organisation and personal relations therein. For this reason, it can assess the situation objectively, without concerns about possible negative consequences, and potentially also formulate more complex recommendations than an internal audit team. However, an external audit team can only work with the information provided by the organisation or obtained during the audit. Important sources of objective information for an external audit team include internal regulations, in particular the code of conduct, work regulations, organisational rules (which help the auditors, among other things, identify positions suitable for interviews), disciplinary policy, and any guidelines covering the reporting and resolving cases of sexual harassment within the organisation. Therefore, the external audit team is more dependent on the cooperation of the audited organisation, and misunderstandings in communication may occur, likely leading to delays in the audit. **A major advantage** of an external audit team is the ability to draw on experience and good practices from working with other organisations in the sector, thus enabling it to identify strengths and weaknesses of the organisation concerned more effectively and design practical recommendations.

Both internal and external audit teams shall comprise at least three to five members experienced in HR management, labour law, gender equality or gender-based violence, or non-discrimination or other areas related to creation of respectful and safer workplaces. It is also advisable that the members of the audit team have at least basic experience with qualitative and quantitative research methods (such as designing and conducting interviews and preparing questionnaires). Bigger teams can help ensure that the audit team possesses the range of skills and experience necessary to carry out the audit. However, an overly large team may pose challenges in dividing the particular tasks and mutual coordination.

Before the audit begins, it is important to divide tasks within the team, clearly define the objectives of the audit, and establish the rules of cooperation (more in Chapter 3). Considering that conducting the audit is

a time-consuming exercise and involves extensive communication with the audited organisation, we recommend that the audit team includes a member responsible for administrative tasks related to the audit (such as scheduling the different phases of audit, ensuring formal requirements of the agreement, etc.).

The audit team is built on close cooperation and information sharing. It is therefore key to establish clear rules of team collaboration at the very beginning, and to communicate frequently and openly. It is important that every member of the audit team has the opportunity to express their views, including critical feedback towards others. The opinions of all team members are welcomed and respected, while any disagreements are addressed through consensus.

An internal audit team has a specific position, which brings about particular challenges. Its **advantage** is that it knows well the environment of the organisation and is able to access information faster, identify potential allies, secure implementation of the recommendations and oversee this process from inside of the organisation, as well as to ensure sustainable change, or prompt modification of the adopted measure in the future in case certain flows occur or a need to adopt new measures arises. **On the other hand**, members of the internal audit team have a difficult position, considering that they identify and highlight potential shortcomings within their own organisation, which may create tension with the employer and with colleagues. Situations may arise where an internal audit team feels hesitant to communicate the findings and design realistic recommendations due to fear of reaction from staff and the management, or of other possible impacts on their future within the organisation, creating the risk of self-censorship. For these reasons, the organisation must clearly communicate the employees the purpose of the audit, as well as the importance of creating a respectful and safer working environment. Employees should perceive the audit team as agents of positive change within the organisation, which shall lead to improved working environment for everyone.

For the abovementioned reasons, we recommend that the internal audit team consists of at least three people who can provide each other a mutual support, care, and exchange expert advice, or provide feedback on each other's work. The audit team should also include people interested in the issues of preventing and resolving sexual harassment in the workplace, or in creating a respectful and safer work environ-

ment, and who also have expertise in at least one of the relevant areas of management – such as the legal department, HR, or internal control. Moreover, the audit team should include people with experience in relevant qualitative and quantitative research methods (especially conducting interviews and preparing questionnaires). Having more people in the audit team (3 to 5) is important also in case someone leaves the team. If only one person were responsible for the audit, it could jeopardise its completion. On the other hand, it is advisable that the audit team is not too large, as that could reduce its efficiency.

From the employer's perspective, this alternative may appear less costly, however, the organisation may lack employees with necessary expertise in preventing and resolving sexual harassment in the workplace, or the employees may be unable to maintain sufficient distance to objectively assess the situation within the organisation (e.g. since it may be difficult for them to critically evaluate their past work). Conducting an audit is a demanding process, which should **always** be reflected in the workload of audit team members – either through a temporary reduction of other tasks so that the audit team can fully dedicate themselves to the audit rather than conducting it in addition to standard work duties, or through financial compensation beyond their regular salary. Participation in the internal audit team must **never lead** to negative consequences for the future professional standing of auditors within the organisation – whether due to negative response from the management or other colleagues to the audit team's findings.

Sexual harassment

For the purposes of this publication, we use the definition of sexual harassment under Article 2a para. 5 of the Act No. 365/2004 Coll. on Equal Treatment in Certain Areas and on Protection from Discrimination and amending and supplementing certain acts (the Antidiscrimination Act)[2]: *"Sexual harassment shall mean verbal, non/verbal or physical conduct of a sexual nature whose intention or consequence is or may be a violation of person's dignity and which creates an intimidating, degrading, disrespectful, hostile, or offensive environment."*

2 National legislation shall be considered, as the definition and framework may differ.

Sexual harassment in the workplace may have different forms, such as:

a) inappropriate jokes, comments, or stories with sexual context, sexist remarks;
b) unwanted comments on a person's physical appearance;
c) sending unsolicited images and messages with sexual undertones;
d) attempts to initiate a relationship or intimate contact despite refusal (or without explicit consent);
e) unwanted intrusion into personal space;
f) unsolicited physical contact or attempts thereof;
g) implying or offering benefits in exchange for intimate contact;
h) stalking;
i) attempted sexual assault or sexual assault/rape.

This list is only illustrative, and sexual harassment can have also other forms. Some of the abovementioned forms of sexual harassment may constitute criminal offences.

In general, sexual harassment in the workplace can be defined as any behaviour of a **sexual or sexualised nature**, that is **unwanted or unwelcome** by the recipient, and as a result of which employees are forced to work in an environment that is **intimidating, humiliating, degrading, hostile, or offensive.**

Sexual harassment constitutes a **form of discrimination and an unlawful conduct,** which may occur either as a single incident or repeatedly. From a legal perspective, it is not relevant whether the person engages in harassment **intentionally or not**. Sexual harassment may occur directly in the workplace, in online environment, or outside the workplace in connection with the performance of work (e.g. during business trip). Harassing behaviour may be directed at the specific person (e.g. unwanted physical contact or unsolicited sending of explicit materials), but it does not necessarily have to have a specific target (e.g. sexually oriented jokes or comments that are considered as offensive by someone).

Sexual harassment occurs **regardless of gender** – of either the persons being harassed or those engaging in the harassment. Sexual harassment in the workplace may come from colleagues, supervisors, subordinates, as well as clients.

Antidiscrimination disputes involve the so-called reversed burden of proof, meaning that the employer is obliged to prove that they did not violate the principle of equal treatment. Under Article 2 para. 3 of the Antidiscrimination Act employers have a positive duty to adopt measures to protect from discrimination, including sexual harassment. This publication provides guidance on how to effectively and sustainably prevent sexual harassment and address it in a respectful manner.

2. What should effective measures for preventing and resolving sexual harassment in the workplace look like?

This chapter briefly outlines measures in the area of preventing and resolving sexual harassment in the workplace. These measures serve to prevent sexual harassment, create a respectful and safer working environment and a sensitive and effective resolution of sexual harassment in cases where it occurs.

From a legislative, ethical, as well as financial perspective, each organisation should aim to prevent sexual harassment. However, even with the best efforts, it cannot be entirely ruled out that sexual harassment in the workplace would not occur, particularly in cases of higher turnover of employees. The organisation's response once the sexual harassment occurs is crucial not only for those who have experienced it, but also for the organisation itself. It is, thus, essential for an organisation to have detailed internal procedures in place for cases of sexual harassment.

In practice, it is crucial that the organisation have clear and comprehensible regulation for reporting sexual harassment cases, accessible options to resolve such cases, and clearly defined processes for resolving them. This includes, in particular, timelines for each phase of the process, persons involved therein, records keeping, sanction for sexual harassment, and the organisation's approach to remedying the situation for the person affected. All individuals involved in reporting and resolving sexual harassment cases should be thoroughly acknowledged with all relevant policies and receive training on how to proceed in a sensitive and respectful manner in sexual harassment cases. Even the best-designed policies do not serve their purpose if employees are not aware of them. **It is thus essential that:**

- information on what conduct may be considered sexual harassment, on the reporting procedure for sexual harassment cases, on the ways of resolving such cases, as well as on potential sanctions for sexual harassment, form part of **onboarding training**.
- the abovementioned information is always available, for instance through permanent e-learning, a website page, leaflets in the workplace, etc. It is important that the information is **accessible at any time, in a confidential setting** (when a person is alone, either at home or at the workplace) to every employee.
- training on the abovementioned topics is conducted **regularly** (see Chapter 4.5 for more details).

Since preventive mechanisms also have a deterrent effect, it is particularly important that the organisation regularly communicates a zero-tolerance approach to sexual harassment and provides detailed information on the forms of sexual harassment, including those less overt.

Table 1 outlines concrete measures that an organisation shall adopt in order to prevent and resolve sexual harassment in the workplace, further divided into five areas described in Chapter 1.

Table 1 Overview of measures for the prevention and resolving sexual harassment cases in the workplace

Training

- The organisation **regularly** (e.g. every two years) provides training on sexual harassment. This training is available for all employees; the organisation may decide to make it mandatory for everyone. The training **should address**:

  a) Types of conduct that may be considered sexual harassment, different forms of sexual harassment, and the applicable legal framework,
  b) The impacts that sexual harassment may have on those who experience it, including impacts on their physical and mental health, social well-being, and performance at work, as well as impacts on the team where harassment occurs and on the organisation as a whole,
  c) The reasons why individuals experiencing sexual harassment or those aware of it do not report sexual harassment,
  d) The procedure for reporting sexual harassment within the organisation, the organisation's values in this area (in particular, zero tolerance of sexual harassment and a respectful and sensitive approach to those who have experienced sexual harassment), and the process of investigating and resolving sexual harassment cases.

- The organisation provides **specialised training** for individuals involved in the system for reporting and resolving sexual harassment cases (e.g. HR department, managers, designated trusted persons, etc.), focusing on communication with individuals who have experienced sexual harassment, with those who engaged in sexual harassment, an on other aspects of investigating such cases (e.g. legal aspects).

- Information on zero tolerance of sexual harassment in the workplace, its forms, and the procedures for reporting and handling sexual harassment cases form part of **onboarding training** for new employees.
- Ideally, the information that are covered in the training, should be **freely accessible**, e.g. in the form of e-learning available within the internal information system.
- Additional types of training related to a respectful and safer workplace are also recommended, e.g. **the so-called bystander intervention training** aimed at equipping employees with skills how to intervene in case they witness sexual harassment.

Organisational culture and climate

- The organisation **has adopted a code of conduct** or other similar policy that prohibits sexual harassment and includes its definition and **examples of behaviour** that may be considered sexual harassment.
- This policy clearly states that sexual harassment **constitutes a form of discrimination** and is therefore an unlawful and unethical conduct.
- The organisation has defined its core **values** within internal documents, including a zero-tolerance of the sexual harassment.
- The abovementioned aspects **are known to all employees**, which is ensured by the organisation (in addition to training) e.g. through internal communication campaign (such as leaflets and infographics displayed in the workplace or within the internal information system).

Reporting and resolving sexual harassment cases

The organisation **has adopted a policy governing the procedure for reporting and resolving** sexual harassment cases. It may choose to regulate this procedure within a code of conduct or other policy that covers the prohibition of sexual harassment in the workplace, or in a separate document, such as an internal directive. In the latter case, such policy may address only the procedure for sexual harassment cases or also cover other forms of unethical conduct, e.g. other forms of discrimination or bullying.

- This policy is **written in a clear and comprehensible manner** and is accessible to all employees in a confidential setting (e.g. within the internal information system, printed and displayed in a space where employees can review it).
- The policy includes **specific information** on to **whom and in what form** sexual harassment can be reported. There should always be multiple reporting channels and designated persons, including anonymous reporting. Having several reporting channels in place allows the person reporting the sexual harassment case to choose the method that feels the most suitable, confidential, and safe. Contact details for the person/department designated for receiving complaints/reports of sexual harassment should be regularly communicated to all employees.
- The policy also specifies **who is involved in investigating a reported case** (e.g. an ethics committee, a dedicated working group, the HR department or a case management team) and briefly outline how the investigation is conducted.
- There are both **formal procedure** (which may result not only in the cessation of the harassing behaviour but in employment-related sanctions as well) and **informal procedure** (which results in the cessation of the harassing behaviour, but not in an employment-related sanction).
- The selection of the procedure **is upon the decision** of the person experiencing harassment, or the reporting person.
- There is **an option to consult** with a designated person or department within the organisation, whether a certain behaviour may constitute sexual harassment and what reporting and resolving options are available in the organisation.
- An important part of the policy is also the **timeframe** for the individual steps of the investigation:

  a) The overall duration of the process (from receiving the complaint to final decision, or adoption of the measure in the case). If necessary, this deadline may exceptionally be extended, however such possibility should be explicitly stated in the policy.

  b) When the reporting person will receive the first response concerning their report, outlining next steps in handling the complaint.

c) Any other relevant deadlines (e.g. when the ethics committee/ working group will hold its first meeting concerning the case, when will it hear the reporting person, etc.).

- A so-called trusted person may be appointed within the system for reporting and resolving sexual harassment case to provide assistance and support to those who have experienced sexual harassment and/or reported the case (if these are not the same person). **The trusted person accompanies** the reporting person (who may or may not choose to use this opportunity) throughout the entire process of reporting and resolving sexual harassment cases and may also **represent** them, for example in procedure before the ethics committee. A trusted person shall be interested in the issue of preventing and resolving sexual harassment cases, who has an empathetic and sensitive approach and in general is trusted by the employees. The trusted person closely cooperates with the management of the organisation in formulating solutions in the particular case, as well as general recommendation aimed at improving the existing system. At the same time, the trusted person shall be able to maintain a sufficient distance to engage critically with the management and act autonomously.
- An alternative to a trusted person is the establishment of an **ombudsperson** role, responsible for investigating individual cases (instead of an ethics committee or working group). Such role shall be as independent from the organisation's management as possible and its findings should be respected and implemented by the management.
- The internal policy includes information on how the organisation ensures the **confidentiality of information** obtained during the reporting and investigating of individual cases (e.g. through confidentiality commitments signed by all persons involved in the investigation).
- In order to ensure confidentiality of the whole process, the policy should also specify **how reports**, investigation records, and evaluations of the implementation of recommended measures **are documented and stored**. Proper record-keeping is a key to preserve organisational memory and to ensure access to information concerning former sexual harassment cases to future employees of relevant departments (especially HR and legal departments), thus enabling them to identify a repeated harassment.

Sanctions and remedial actions

- Internal policies **define** sexual harassment **as a breach of workplace discipline** and specify sanctions that may be imposed in sexual harassment cases.
- The system of imposition of sanctions **is transparent** and known to employees.
- Employees **know who decides** on the sanctions and what factors are detrimental to apply the specific sanction.
- Employees are confident that sanctions will be **applied consistently in all cases**.
- The organisation **applies stricter sanctions** in cases of repeated sexual harassment.
- The organisation has developed a **framework for remedial actions** for persons who have experienced sexual harassment or have been otherwise negatively affected by it. Remedial actions must not be implemented against the will of the affected person or to their detriment (e.g. transferring the affected person to another department for their safety and well-being, if they did not choose this option themselves).

Monitoring

- **Regular anonymous surveys** are conducted to assess employees' experience with the organisational climate, including questions concerning sexual harassment in the workplace.
- These questionnaires are available both online and in paper formats.
- The organisation maintains records of received reports, the course and outcomes of investigations, sanctions imposed and remedial actions implemented. This enables the organisation to identify if an employee repeatedly engages in sexual harassment, potential shortcomings in the reporting and resolving procedures, and the effectiveness and appropriateness of sanctions and remedial actions.

3. What to focus on before the audit

It is important that the audited institution understands what to expect from the audit process, including its objective and expected outcomes. It is therefore crucial to clearly, transparently and specifically define the rules of cooperation between the audit team and the audited organisation. This section provides guidance on how to set up a future cooperation, what to focus on and what to avoid. This chapter is primarily intended for external audit teams, however, many of the below mentioned tips are applicable also for internal audit teams, considering the necessity that the audited organisation understands the importance of each step of the process, as well as the overall goal, in order to achieve a sustainable organisational change. It is thus crucial that the organisation's management and the audit team clarify the objectives, the steps required to achieve them, including any potential constraints.

It is possible to see what the future cooperation will look like already in the initial phase. Could you have the opportunity to choose the organisation you will work with, we recommend you communicate with multiple members of the organisation's management to assess whether the cooperation will be realistic and feasible. It may be possible, that at a given time the organisation is not in the appropriate position to implement genuine changes of its internal policies that would lead to creation of effective and truly accessible mechanisms. If you observe reluctance or a lack of openness during the preparatory communication, it is worth considering if the organisation is a suitable partner for the demanding audit process, which should be followed also by implementation of recommendations. Merely formal changes of policies without a genuine interest of the management to bring about a real change within the organisation may have a negative overall impact, as effective systems of reporting and resolving sexual harassment require employees' trust towards them. Moreover, if someone within the organisation decides to report a case of harassment, and the organisation fails to handle it properly, this will negatively affect the willingness of others to report sexual harassment in the future.

TIP: *It is beneficial to inform employees (e.g., through leaflets or via individuals who recognise the importance of the issue) about available counseling and legal aid services provided by the national equality body, even in those organisations where you ultimately do not conduct an audit, in cases where their employers do not sufficiently protect employees from sexual harassment.*

Below listed steps and recommendations are vital for a successful audit:

1. Contact the organisation with an offer of cooperation. You can approach organisations individually (e.g. based on positive past collaboration), or send a general offer with a basic description to umbrella organisations in the sector (e.g. the relevant ministry or an employers' union), or to multiple organisations within one sector (selected randomly or with an aim to ensure diversity among audited organisations, e.g. in terms of size, etc.) or a specific region.
2. Present the organisation's management individual steps of the audit, the scope and timeline of cooperation, clearly state what will be provided by the audit team and what is expected from the audited organisation, and ensure the audited organisation's cooperation in implementing the proposed recommendations.

   TIP: *Establish rules of anonymity or disclosure at the beginning of the cooperation – some organisations may engage in cooperation due to publicity, others may fear negative findings of the audit and their impact on reputation. It is also advisable to agree in the very beginning on how and to what extent the audit findings will be published.*

3. Sign a cooperation agreement with the audited organisation, including specific steps of the collaboration and the expectations for both the audit team and the audited organisation.
4. Set deadlines for the implementation of individual audit steps, as well as realistic time expectations (e.g. when the organisation can expect audit findings and what is expected from the audited organisation in order to meet the timeline).
5. Examine circumstances that could possibly have a (negative) impact on the implementation of the plan – such as other projects implemented by the organisation, change in management, change of internal system, compliance with legal obligations, time necessary to amend documents and the adoption process (e.g. in the public sector), and the extent to which trade unions are involved in the adoption or amendment of internal documents.
6. Sign a cooperation agreement with the audited organisation, including specific steps of the collaboration and the expectations for both the audit team and the audited organisation.
7. Conclude a contract with the contact person within the organisation, including remuneration and the responsibilities of the contact per-

son. The contact person will be responsible for communication with the audit team and facilitating cooperation of the audited organisation (e.g. sending relevant documents, selection of individuals for interviews, distributing internal survey, etc.).

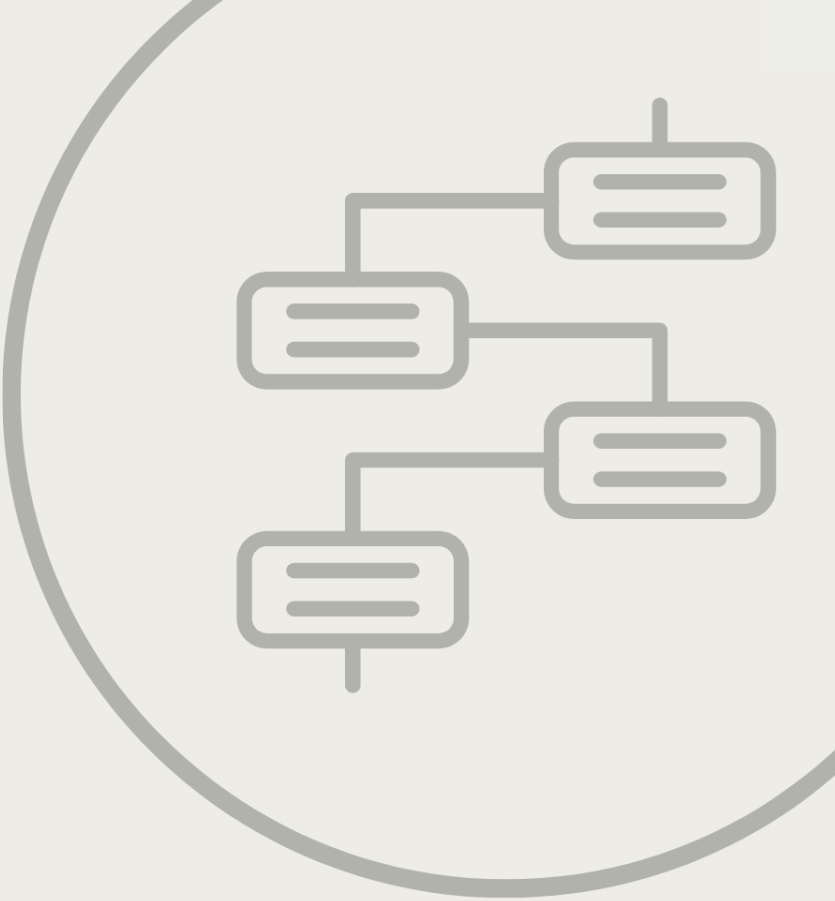
***TIP:** If possible, we recommend that your contact person be someone interested in the topic and holds a managerial position or otherwise has the ability to promote changes within the organisation.*

***TIP:** In the case of an **internal audit team**, it is essential that the members' participation is financially compensated (either by temporarily removing other work duties while maintaining the salary, or a salary increase if they would be conducting the audit in addition to their regular duties).*

8. If you encounter other individuals showing interest in the topic (e.g. a lawyer of the audited organisation) during the process of establishing cooperation, we recommend staying in touch with them since it is important to have allies within the organisation who can help promote changes that may face resistance from some employees.
9. Include cooperation and information sharing with the audited organisation after the audit is completed within the cooperation agreement. This step is crucial to ensure a sustainable organisational change. It is essential to communicate at the outset of the cooperation that it does not end with presentation of recommendations, or their implementation and training activities. Even if the cooperation with the organisation is exceptional, it may happen that further measures are found needed upon implementation of the recommendations, or that the existing measures should be modified. For this reason, it is advisable to keep the door open for future cooperation and to be able to monitor practical impact of the implemented recommendations. The issue of preventing and resolving sexual harassment in the workplace is complex and thus it is impossible to foresee all potential situations that may arise after measures are introduced.
10. We recommend that one representative of the audit team communicates with relevant persons within the audited organisations at any given time. This is important for establishing closer relations and monitoring the content and frequency of mutual communication. Especially when conducting multiple audits at the same time, it is crucial to always have one person, a coordinator, within the audit team, who is aware of the steps planned as well as activities already carried out in the organisation concerned.

TIP: *It may happen that the communication between the audit team's coordinator and the contact person within the organisation is difficult. If possible, try replacing the representative of the audit team (if the issue is personal antipathies), adding a third person to the communication (to ensure more professional approach), or suggesting a meeting to seek ways to reach a more effective communication jointly.*

11. When designing the cooperation, it is important to bear in mind, that the management of the organisation may change during the course of the collaboration. It is therefore advisable to clearly define expectations and obligations of both sides within the cooperation agreement, in order to prevent that a change of management towards one that is not supportive of the process leads to termination or major disruption of the cooperation.
12. Before starting the cooperation, the audit team should establish internal rules, including regular team meetings to evaluate individual audit steps, share experiences, and address situations where a member of the audit team might experience sexual harassment during the audit process.



4. Audit process

The audit model presented in this manual comprises of four phases. The first three phases aim to collect relevant data and information. The last phase serves as a transition to the implementation of recommendations in practice. We recommend focusing on five areas – training, organisational culture and climate, reporting and resolving sexual harassment cases, sanctions and remedial actions, and monitoring – within each phase of the audit.

Audit phases:

1. Analysis of internal policies;
2. Interviews with relevant stakeholders within the organisation;
3. Survey among employees;
4. Designing recommendations and consultations concerning their implementation.

In general, the audit focuses on whether **policies** for preventing and resolving sexual harassment exist within the organisation, on the nature/content of these policies, on how **relevant persons apply them in practice**, and on employees' awareness of these policies.
In practice, **different situations** may arise:

a) There is no specific regulation for reporting sexual harassment and other forms of discrimination within the organisation; when facing the need to address unethical conduct within the organisation, the management does so on an ad hoc basis, and employees in general do not know how to proceed in such cases;

b) There is a framework for reporting unethical behaviour within the organisation (e.g. in the code of conduct or a specific directive), however it does not include a detailed procedure describing how the persons involved should act and/or employees are not aware of the existing internal policies;

c) There is a framework for reporting unethical behaviour within the organisation, which includes a detailed and clear procedure for reporting and resolving sexual harassment cases and employees are informed about the internal policies upon onboarding; the policies are easily and continuously accessible and the organisation provides regular and repeated training concerning these policies – **this represents the target state that the organisation should reach as a result of the audit.**

We recommend assessing the state of preventing and resolving sexual harassment within the organisation using indicators of prevention and response (Table 2). The method of indicators enables to assess the extent to which the organisation meets the defined criteria. The indicators are based on the publication *Workplace Free from Sexual Harassment – How to Achieve it?* (original title *Pracovisko bez sexuálneho obťažovania - ako na to?*).

Before starting the audit itself, it is important to internally agree within the audit team on how the individual phases of the audit will be evaluated. We recommend filling in the table progressively as each phase is carried out. For a more objective assessment, it is appropriate that each phase is conducted by multiple team members filling out the table jointly and discussing their findings and experience from the audit. It is useful to take notes from such discussions, as they may provide valuable insights to the audit team in later stages of collaboration with the audited organisation, in particular, if the audit team cooperates with multiple organisations simultaneously.

Within the audit, the audit team assesses the level of fulfilment of the indicators listed in Table 2 through:

- **Analysis of internal policies** – whether relevant information is covered in the internal policies of the organisation;
- **Interviews with the selected stakeholders** – how the specific indicators are applied within the organisation, particularly from the perspective of its management[3];
- **A questionnaire addressed to employees of the organisation** – whether employees are aware of existing policies and measures for preventing and resolving sexual harassment in the workplace.

The indicators are evaluated using the options Yes, Partially, or No. If a particular method of assessment is not relevant for a certain indicator (e.g. analysis of internal policies when assessing the implementation of trainings), it is marked with an “x” in the table.

***TIP:** We recommend distinguishing the assesment in the table by a traffic light method (e.g. “Yes” in green, “Partially” in orange and “No” in red).*

3 Management refers to organisation’s leadership (top management, HR and legal department, etc.) and managing employees under the rules of organisation of the organisation concerned.

If you mark “Yes” in all three columns of the table, it means that the given indicator is regulated in the internal policies of the organisation, it is implemented in practice by the organisation’s management in line with the internal policies, and that the employees are aware of the regulation.

For instance, when assessing the indicator No. 22 “*There is an option for reporting sexual harassment cases anonymously.*”, you mark “Yes” in the column “Internal Policies” if anonymous reporting and its requirements are defined in the internal policies. You mark “Yes” in the column “Interviews” if participants in the consultation are aware that anonymous reporting is possible within the organisation, and, ideally, they also know how to file such a complaint. Mark “Yes” in the column “Internal Survey” in case a substantial proportion of employees (e.g. over 80%) indicates in the questionnaire that anonymous reporting is available in their organisation.

TIP: *It is important to establish a framework for evaluating different response options before the audit begins, i.e. the proportion of employees’ responses in the survey considered sufficient to assess fulfilment of a given indicator with an option “Yes” (e.g. at least 80%), “Partially” or “No” (less than 30%). With respect to interviews, contradictory responses may be expected (some respondents may say that there is an option of anonymous reporting within the organisations, while others are not aware of such an option). Thus, it is also advisable to define in advance a framework for evaluating interview responses (e.g. at least 8 out of 10 respondents must be aware of such option in order to mark “Yes”; when assessing procedures for handling reported cases, only views of those respondents who were directly involved in such procedures and therefore have relevant knowledge should be taken into account).*

The evaluation recorded in the table should be explained in the narrative part of the audit report, which briefly describes the findings giving grounds to the value of the indicators. In particular, in cases where the answer is “Partially”, it should explain the reasons for this assessment – e.g., in respect to indicator No. 25 “Procedures for resolving sexual harassment cases are written and consistently applied in practice.”, the reason for considering it as only partially fulfilled might be that while the procedures are written in the documents, there are shortcomings in their practical implementation. **The narrative part of the audit report should provide the employer with a more comprehensive perspective, underline strengths** and weaknesses of preventive measures and propose steps for improvement.

Table 2 Indicators for the Prevention and Resolution of Sexual Harassment within the Organisation

Organisation:		**Analysis of internal policies**	**Interviews**	**Internal survey**
Training				
1.	Internal policies include a commitment to provide training on topics concerning creating a respectful workplace.			
2.	A training on sexual harassment has been conducted for employees within the last 5 years.	X		
3.	Information about the training was officially communicated and shared with all employees. Employees were aware of the training.	X		
4.	The training is available for all employees, including support/technical staff. It is either mandatory or sufficient conditions are created to ensure participation of all employees, and the employer commits to provide such training.			
5.	The training includes information on how sexual harassment manifests and why it is considered unacceptable behaviour in organisations. Participants report that this information was included in the training.	X		
6.	The training includes information on procedures for reporting and resolving sexual harassment cases. Participants report that this information was included in the training.	X		
7.	Employees involved in receiving complaints and resolving cases of sexual harassment have completed a specialised training focused on necessary skills in this area, such as empathetic and respectful communication, legal frameworks in the area of non-discrimination and labour law, etc.).			X
Organisational culture and climate in the workplace				
8.	Internal policies contain a clear definition of sexual harassment, including specific examples of such behaviour, and employees are aware of it.			

9.	Internal policies (e.g. the code of conduct or work regulations) explicitly identify sexual harassment as unethical or unfair conduct and employees are aware of this regulation.			
10.	Internal policies define sexual harassment as a form of discrimination, i.e. unlawful sexual conduct, and employees are aware of this.			
11.	Sexual harassment is explicitly prohibited also in relation to clients or other external persons, and employees are aware of this.			
12.	The employer declares and provides protection from sexual harassment by clients or other external persons, and employees are aware of this.			
13.	Organisational rules state that protection against sexual harassment also applies to other places outside the designated workplace (e.g. during the business trips, team-building events, etc.), and employees are aware of this.			
14.	Employees are able to identify sexual harassment and recognise the unacceptability of such conduct.	X		
15.	The organisation applies a zero-tolerance approach to sexual harassment – the principle of zero tolerance is included in policies, complaints and reports of sexual harassment are not trivialised and receive appropriate attention.			
16.	The management actively encourages and motivates employees to report cases of sexual harassment.	X		
17.	Unwanted sexualisation does not occur in the workplace.	X		
18.	Rejection of unwanted sexualisation can be expressed openly without negative response.	X		
Reporting and resolving sexual harassment cases				
19.	A mechanism for reporting sexual harassment cases or submitting complaints is in place, and these procedures are known to all employees.			
20.	The department/employees to whom reports should be addressed are clearly designated, and employees are aware of this.			

21.	Multiple options are in place for reporting and resolving sexual harassment – e.g. formal, informal, or consultative procedures, and employees are aware of this.			
22.	There is an option for reporting sexual harassment cases anonymously, and employees are aware of this.			
23.	There is a designated department/ team or a person for reviewing reports, and employees are aware of this.			
24.	Employees responsible for this area are properly trained to receive reports/complaints.			
25.	Procedures for resolving sexual harassment cases are written and consistently applied in practice.			
26.	Time limits for investigating cases are set and these deadlines are respected in practice.			
27.	The entire process of handling sexual harassment cases is confidential.			
28.	Individuals who submit a complaint/ report the case of SH are informed about the next steps.			
29.	The process of reviewing the complaint/report is documented, and records are kept of all communications.			
Sanctions and remedial actions				
30.	It is clearly defined who proposes and imposes sanctions and remedial actions within the organisation, and employees are aware of this.			
31.	Internal policies define sexual harassment as a breach of workplace discipline, and employees are aware of this.			
32.	Internal policies specify sanctions for sexual harassment, and employees are aware of this.			
33.	Internal policies guarantee protection of the reporting person from negative consequences resulting from reporting sexual harassment, and this protection is consistently applied in practice.			

34.	Internal policies state that when adopting remedial actions and sanctions, care must be taken to avoid negative impacts on the person who experienced the harassment. This rule is applied in practice.			
Monitoring				
35.	The organisation periodically monitors workplace climate, including experience with sexual harassment.	X		X
36.	The findings are taken into account when adopting measures to improve the working environment.			X
37.	Monitoring methods are safe and anonymous for participants.	X		
38.	The organisation keeps records of reports received, including investigation outcomes, sanctions imposed, and remedial actions taken.			X

4.1 Analysis of internal policies of the organisation

The initial phase of the audit is an analysis of internal policies – regulations and documents of the organisation. All internal policies that can somehow regulate any of the abovementioned areas (training, organisational culture and climate in the workplace, reporting, sanctions and remedial action, monitoring) are relevant. In general, Work Regulations and Code of Conduct are the basic policies. The organisation may have adopted other relevant policies, such as a directive on reporting violations of the code of conduct, rules of procedure of the ethical committee handling violations of the code of conduct, or a directive regulating procedures for reporting and resolving sexual harassment, or discrimination in general. Public administration bodies often have also directives regulating the procedure for filing complaints.

All these policies should be provided to the audit team upon request by the contact person within the organisation. It may happen that interviews with participants from the organisation (the second phase of the audit) show that there are other policies which may be relevant with respect to the indicators evaluated. In such a case, the audit team requests the contact person to provide the documents concerned and includes them in the analysis.

In the ideal scenario, internal policies include:

- **The organisation's stance on sexual harassment, in particular:**
  - An explicit prohibition of sexual harassment;
  - A clear definition of sexual harassment as a form of discrimination and unethical conduct;
  - A definition and identification of specific forms of sexual harassment, including gender-based harassment (e.g. inappropriate comments and jokes with sexual undertones), noting that the list is not exhaustive but rather exemplary;
  - The organisation's commitment to zero tolerance of sexual harassment and to creating a respectful and safer working environment.
- **A detailed definition of the reporting mechanism for sexual harassment, in particular:**
  - Whether there is an option for a non-binding consultation (i.e. whether a particular conduct may be considered sexual harass-

ment and how to proceed further, without pressuring the person to report) – if so, whom with;
- Formal requirements for a report;
- Whether it is possible to report anonymously;
- Whether it is possible to report as a witness or another person aware of the harassment;
- Whom to and by what means a report should be addressed (e.g. by email, post, confidential reporting box, using a specific form etc.);
- What happens to the report after submission, including timelines and the person responsible to respond to the reporting person and inform them about the next steps.

• **A description of the principles and methods of investigation a report, in particular:**
- Identification of persons involved in investigating the report (e.g. the ethics committee, case management team, etc.);
- Rules for excluding persons from the investigation in cases of conflict of interest;
- Application of a victim-centred and respectful approach to the investigation process;
- The possibility to request separate hearings of the reporting person and the reported person;
- Clarification of how a witness testimony can be provided;
- Conditions and procedures for communicating outcomes of investigation, including the possibility of appeal;
- Time limits for convening the investigation body, completing the investigation, and communicating investigation results.

• **A detailed description of the mechanism for imposing sanctions and remedial actions, and monitoring received reports, in particular:**
- Information on the mechanism for protection against retaliation against the reporting persons;
- Information about and examples of possible sanctions against a person who has committed sexual harassment, as well as specification of who decides on sanctions and timeframe for such a decision to be made;
- Information on remedial action for the person who has experienced sexual harassment;

- Available services for victims/survivors, such as legal counselling, psychological support, or consultations with a confidential person, ombudsperson, or a similarly designated role;
- The method of record-keeping of the reports received and other relevant documents (e.g. minutes).

- **A description of training and communication concerning internal policies in the area of sexual harassment, in particular:**
  - The obligation of employees to familiarise themselves with the code of conduct, or other relevant policies, and the definition of how this is ensured;
  - The organisation's commitment to provide trainings on sexual harassment;
  - The obligation of managers to undertake training in ethical, respectful, and responsible leadership.

As part of the audit, the audit team identifies which of the above listed points can be found in the evaluated policies and it may also highlight the strengths of the existing internal policies. It quotes the exact wording of the relevant provisions and refers to specific policies in the audit report. It is practical to stick to the abovementioned thematic division into five, or rather four (as monitoring is usually not regulated by internal policies; however, if it is regulated, then it is clearly relevant to include this area as well).

Recommendations concerning internal policies in the audit report

The audit report has a descriptive and evaluative nature. It provides a description of what the internal policies cover and at the same time includes recommendations on what should be amended or added. Recommendations concerning internal policies identify the missing provisions which should be included in order for the system of prevention and resolution of sexual harassment to be effective, including specific examples and proposed amendments to existing rules. Specific recommendations should be accompanied by a justification for the proposed amendments and additions.

TIP: *Recommendations may include several alternative options for organisations to choose from, taking into account their time capacity and preferences.*

Within the recommendations, it is advisable to also focus on mutual consistency of internal policies. Any proposed amendment of one policy should be reflected also in recommendations concerning other relevant policies (e.g. a proposal to amend the definition of sexual harassment shall be included in all policies where it appears, such as the code of conduct or the work regulations).

TIP: *Recommendations concerning internal policies shall incorporate, where appropriate, also the value of a respectful and safer workplace (e.g. include the responsibility for creating a respectful workplace as a duty of managing employees within work regulations, etc.).*

4.2 Interviews with selected employees

The second step of the audit comprises conducting and evaluating interviews with selected employees. The main purpose of these interviews is to gain an understanding of how the internal policies apply in practice. It may happen that an organisation has a formally well-developed policy for reporting and resolving sexual harassment cases but, due to various reasons, it is not effective in practice (e.g. insufficient employee awareness, key individuals involved in the reporting and resolving system are not considered trustworthy, etc.). On the contrary, there may also be situations that the internal policies do not regulate the reporting procedure, however effective and commonly used practices exist. In addition, the interviews may identify a specific practice, as well as the strengths and weaknesses of internal procedures for reporting and resolving sexual harassment cases.

Selection of respondents: The purpose of the interviews is to gain an insight into how internal procedures function, get to know the general atmosphere and organisational climate, identify potential allies for introducing new measures or sources of resistance, and learn about cooperation between departments, etc. Primarily, persons from top management, as well as middle and lower management, should be approached. The number of respondents depends on the size and structure of the organisation, as well as on the capacity of the audit team. However, we recommend including a minimum of 12 – 15 respondents. If the audit is conducted by an external audit team, it should request the organisational structure from the contact person to identify suitable respondents. Priority should be given to those departments that are involved in the system for reporting and resolving sexual harassment according to internal policies. If such system is not in place within the organisation, respondents are typically selected from the legal department, the HR department and internal control/audit unit. In order to ensure a greater objectivity, it is advisable to include at least two respondents for each department if possible and strive for a gender-balanced sample. It is also advisable to include a respondent from the department responsible for staff training and a representative of trade unions, if established within the organisation. The sample should be complemented by individuals from lower management across different organisational unit, as well as several ordinary employees.

TIP: *If audit is conducted in highly hierarchical environments, we recommend involving also employees in lower-level positions in the interviews, as their experiences may be crucial for identifying weaknesses and strengths of the existing organisational policies.*

If the organisation includes services such as a canteen, cleaning and maintenance, it is necessary to involve managerial staff from these units as well.

TIP: *It is advisable to share the list of selected respondents (at level of job positions) with the contact persons well in advance so they can ensure their availability. We recommend explaining the contact person what the purpose of the interviews is and the importance of a diverse sample of respondents in terms of gender, seniority, and departmental representation, so that they can better suggest specific persons who should participate in the interviews.*

Time and location of interviews: It is recommended to allocate one hour per respondent. In practice, the interview time may range from 20 to 90 minutes. It is advisable that the contact person within the organisation provides the audit team with a schedule of interviews and the name list in advance.

TIP: *In some organisations, it is possible to identify persons requiring an allocation of more time already in advance. These are primarily persons directly involved in reporting and resolving sexual harassment cases, or those with long-term experience (e.g. in HR department). More time should be reserved for interviews with such individuals.*

TIP: *It is important to include longer breaks in the schedule – at least 15 minutes after every third interview and a longer break in the middle of the day. It is also advisable to check whether food is available for sale also for on-site external persons.*

Concerning the location of the interviews, it is crucial to ensure privacy and confidentiality. Interviews may take place in the offices of respondents only if no one else is present and if it is ensured that no one enters the office during the interview. It may be practical to reserve a separate room for the interviews, where respondents take turns. If two or three members of the audit team conduct the interviews, it is absolutely inappropriate for them to do so in a shared room, even if large.

Therefore, already during the preparatory stage it shall be insisted that any member of the audit team has a separate room where no one else is present during the interview. Such a room should provide a quiet and safe space, hence it is important that minimum noise enters from outside and that the content of the interview cannot be overheard.

TIP: *If during the first interviews you found out that the designated room is not suitable, inform the contact person and ask them to arrange an alternative.*

Before the interview

Before the interview, the respondents must be asked to sign an **informed consent** (Annex No.1). This should mainly contain information on who is conducting the interview, its purpose, how the information obtained will be used, who will it be shared with and to what extent, and the option to withdraw from the interview at any time.

Recalling one's experiences with harassment may be distressing or even retraumatising. Therefore, it is advisable that the informed consent form includes contact details of institutions that individuals can turn to if they experience negative emotional reactions. The informed consent should also include contact details of the auditing institution, noting that this contact can be used in case of any questions or remarks concerning the content or conduct of the interview.

The informed consent should also specify the form of recording the interview, with reference to two main options – **audio recording or written record**. The advantage of audio recording is that it captures statements precisely. On the other hand, its disadvantage is that it may lead to increased caution or self-censorship by respondents and requires more time for the audit team for transcription. Since the interviews are not conducted for research purposes and do not require an in-depth analysis of individual experiences, but rather a generalisation of responses, the written record can be considered sufficient.

The informed consent should be printed in two copies, one for a respondent and the other for the auditor conducting the interview.

TIP: *The audit team keeps archives of signed informed forms for the purpose of documenting the work carried out and for potential project audits, ensuring that they are stored securely and that the confidentiality of the interviews is not compromised.*

At the beginning of the meeting, the auditor introduces themselves and the organisation conducting the audit, explains the audit process and its objectives, clarifies the aim of the interviews and emphasises the anonymity and confidentiality of the responses. They also specify with whom and to what extent will the information from the interview be shared. Only upon this introduction does the auditor provide the respondent with the consent form and provides them sufficient time to review it.

TIP: *It may happen that the organisation has not explained the respondent the reason and purpose of the interview. They may express concerns or reluctance to participate in the interview. It is therefore crucial not only to explain the purpose of the interview but also appreciate that they have taken time to participate in the audit and support the audit team in complex mapping of the situation in the organisation and formulating precise recommendations.*

Interview process

It is advisable to approach the interview as a semi-structured interview, i.e. start with predefined thematic areas of questions prepared in advance, which may be modified and supplemented depending on the course of the interview. Annex No. 2 contains a sample list of questions structured according to five main audit areas. Each question/group of questions includes objectives followed, what enables modifications of the wording of the question (e.g. depending on the audited sector) while maintaining the given objective. It is important to thoroughly study the specific questions, as well as their objectives, before conducting the interview, thus ensuring it proceeds smoothly.

TIP: *If the respondent answers another question as part of their answer, it is not necessary to return to it later.*

Since the objective of interviews is not to address personal experiences with sexual harassment, the auditor does not ask respondents directly whether they have experienced sexual harassment. However, it may happen that they spontaneously share such experience. In such case, it is appropriate to listen to them.

TIP: *If you feel that the content of the interview has disturbed the respondent (e.g. due to personal experiences), it is appropriate to consider its termination in order to avoid that the person concerned is further traumatised.*

The concrete content of the interview depends on the respondent's role within the organisation and how long they have been working for the organisation. In case they are not involved in the system for reporting and resolving sexual harassment and are not aware how to proceed in such cases, some questions may be skipped or addressed with less detail.

TIP: *In case that respondents forming part of departments involved in reporting and resolving sexual harassment cases (such as the HR department) cannot answer questions regarding internal procedures in sexual harassment cases (e.g. they yet do not have experience with such cases), it is possible to initially guide them through questions concerning procedures for other forms of unethical conduct, e.g. bullying. Sometimes, during the interview, respondents recall different cases related to sexual harassment that they have handled or experienced in the organisation. In such case, we recommend coming back to certain question to see whether the respondents would like to add something.*

The aim of the interviews is not to educate participants on the issue of sexual harassment, therefore, do not correct the respondents if they provide inaccurate information, unless they explicitly ask whether their answer is correct. However, after the introductory questions aimed to assess the level of awareness on the term "sexual harassment", it is possible to clarify the concept if the respondent misinterprets it (e.g. they may confuse it with sexual abuse or rape), in order to facilitate a clearer and more accurate continuation of the interview.

TIP: *After each interview, it is recommended to take brief notes summarising the main findings, and possibly a proposal of concrete recommendations that emerged during the interview. This is crucial mainly if you conduct various interviews within one day, as information overload may occur. It is also useful to number the record sheets so that you can recall the interviewed person more easily.*

A resistance to the topic, as well as views that normalise or trivialise sexual harassment or some of its forms, may arise during interviews. For the audit team, this serves as information about the situation within the organisation, however, their role in this phase is not to correct or educate respondents. Even if we internally disagree with certain statements, it is advisable to avoid confronting them.

TIP: *If a respondent consistently questions the importance of addressing sexual harassment in the workplace throughout the interview, it may be useful to draw attention to available statistics on the prevalence of sexual harassment in the given sector, or in workplace generally. The aim is to underline the fact that the sexual harassment occurs in the workplace even if the respondent has not experienced it personally.*

If the auditor is faced by a behaviour that violates their personal boundaries, they may of course set clear limits (see Chapter 5 for more information).

If respondents show a deeper interest in the topic and ask questions, it is possible to provide brief information or clarification.

TIP: *Before conducting the first interview, the audit team should establish how it will respond to potentially negative situations (e.g. resistance, trivialisation, emotional distress). Based on experience from the first interviews, it is advisable to update this strategy. Whenever a negative experience occurs, we recommend discussing it with other members of the audit team. The aim is to provide mutual support and to collectively develop good practices for handling similar situations.*

Analysis of findings of the interviews

If interviews are being conducted by multiple persons, it is advisable to hold a joint meeting as soon as possible upon completing all interview within the institution and inform each other about the responses to individual questions from respondents. We recommend recording the main findings during the meeting or immediately afterwards. Statements from different individuals may contradict, which is a common state, and this ambivalence should be reflected in the final report. When sharing observations and findings, it may be useful to focus not only on factual content but also on the terminology used or nonverbal reactions to certain topics of questions. The indicators (Table 2) provide an analytical framework for evaluating the responses. Given a relatively small number of respondents and the involvement of a coordinator in their selection, it is necessary to pay due attention to anonymise the findings and avoid referring to specific quotes or examples of situations described.

The interviews may serve not only to collect information necessary to evaluate the indicators but also to understand internal dynamics and hierarchy of relations, as well as for anticipating potential obstacles and challenges. This information should be recorded and taken into account when designing recommendations, interpreting survey findings, communicating with the organisation, or preparing the training content.

The meeting should also create space for sharing personal experiences, frustrations, or uncomfortable feelings that may arise during the interviews. Different forms of resistance to the topic, as well as harassing behaviour (e.g. joking about sexual topics), can constitute relevant material for analysing and evaluating the indicators and for addressing recommendations (e.g. they may show organisational climate and dynamics, identify potential perpetrators or highlight arguments organisations may face when implementing relevant procedures). Sharing uncomfortable experiences is also important for ensuring the well-being of the audit team, both to process negative emotions, test the effectiveness of internal norms in cases of harassment or lead to introduction of new norms (See Chapter 5: Wellbeing of the audit team).

Recommendations based on findings from interviews with relevant stakeholders

Recommendations formulated by the audit team on the basis of interviews primarily concern improving practical application of internal policies, or, where necessary, introducing such policies (e.g. when interviews revealed that there is no unified procedure within the organisation or the respondents were unclear about how to proceed), increasing awareness of the content of internal policies and specific procedures.

4.3 Internal survey within the organisation

An internal organisation survey is conducted to assess employees' awareness of the organisational policies and measures in the area of sexual harassment, as well as their experiences with sexual harassment.

There may be a situation that the management of the organisation is convinced that it communicates the internal policies sufficiently and creates a safe enough environment for employees to report sexual harassment, however, the survey findings reveal that this is not the case. The survey makes it possible to identify whether the employees know how to proceed in cases of sexual harassment, are aware of the option of anonymous reporting, or have information on how investigations are conducted. It also allows to collect data on the prevalence of sexual harassment within the organisation and on whether the case has been reported, reasons for not reporting and whom employees would turn to if they experienced sexual harassment.

Preparation of the survey

A sample internal survey is included in Annex No. 3. The questions may be modified with respect to specificities of the given sector; however, it is important that the survey covers questions concerning:

- The ability of employees to identify sexual harassment;
- Experiences of employees with sexual harassment within the organisation, including:
  - If they experienced sexual harassment and reported it – how the case was handled, what the outcomes were, and whether they were satisfied with those outcomes;
  - If they experienced sexual harassment and did not report it – what the reasons were for not reporting the incident;
- Employees' awareness of key aspects of the system of prevention, reporting and resolving sexual harassment;
- Trust in relevant individuals within the organisation who are involved in the reporting and resolving sexual harassment cases;
- Demographic data – for the purpose of identifying vulnerable groups within the organisation who may experience sexual harassment more frequently, report it less often when facing it, or have

more negative experiences with the investigation process and its outcomes.

A survey can provide valuable insights about the organisation, which may create temptation to include many questions. However, this can discourage the employees from completing it. It is therefore important to strike a balance between the information necessary to evaluate the indicators and the reasonable length of the survey. Ideally, the time required to complete the survey should not exceed 20 minutes. Annex No. 3 includes a sample set of survey questions. The questions can be converted into an electronic format using survey tools, which allow for question branching (i.e. the following questions appear only to respondents who have responded yes/no to the previous question).

TIP: *Before distributing the survey, it is recommended to conduct a pilot testing (e.g. test the survey with colleagues from the audit team) to check whether the questions are clear and whether the question flow functions properly.*

Survey distribution

An internal survey is key for assessing the organisational climate concerning sexualisation in the workplace, measuring employees' trust in management, and evaluating awareness of employees of internal processes and policies. However, experiences of individual employees may significantly differ depending on their role, department/team, age or length of their service within the organisation. It is therefore crucial that the survey reaches all employees. To achieve this goal, it is recommended to:

- Conduct the survey in both online and paper formats. In both cases, it is essential to ensure anonymity of the survey. The audit team does not share the content of individual responses with the management of the organisation, so that it is not possible to identify responses of specific employees.
- Identify the most appropriate method of distribution of the survey in cooperation with the contact person within the organisation taking into account the conditions of the organisation concerned (e.g. intranet, email, via managers).
- Have the online version of the survey distributed to employees by the top management of the organisation (with an explanation of the purpose and importance of the survey for creating a more safe and

respectful environment), thereby reinforcing the significance of the issue.

> ***TIP:*** *If the survey is conducted by the internal audit team, it is advisable to use external data collection software that is accessible only to the audit team, and to specifically state the commitment that responses will not be shared with other persons.*

- Distribute paper survey through team or department managers. However, managers should not pressure employees to complete the survey or track who has submitted it already. Their role is to encourage people to participate, reinforcing the importance of the survey.
- Provide multiple options to submit the survey in order to ensure anonymity, e.g. a collection box accessible at any time for multiple teams/departments.

> ***TIP:*** *Paper questionnaires should be distributed together with envelopes so that completed forms can be sealed. The collection box should be displayed either in a private location or in a high-traffic area (however not in places like reception/directorate etc.) to increase anonymity. The collection box must be secured so that only authorised persons can access it (the audit team, the contact person, HR department). The audit team receives the sealed envelopes.*

- Allow sufficient time to complete the survey (e.g. two weeks), taking into account circumstances that may affect participation (e.g. holidays, operational breaks or vacations), and send at least one reminder during the survey period.

> ***TIP:*** *Response rate support and confidentiality – a high response rate is important for representativeness of responses. Participation tends to increase if employees are given time to complete the questionnaire during working hours (e.g. after a team meeting), and if the contact person sets internal deadlines and monitors response collection. It is crucial to ensure confidentiality during both organised completion and submission. If employees do not trust the anonymity of the survey, they may provide inaccurate or incomplete responses.*

Survey analysis

The main findings of the survey form part of the audit report. We recommend using graphs and table with descriptions for clarity. Data collected via the survey do not need to be statistically analysed in more detail, descriptive statistics method is sufficient for the purposes of the audit report. Survey findings should be divided into five audit areas, while experience of sexual harassment in the workplace may be presented at the very beginning or within the part on organisational culture and climate at workplace.

Before analysing the survey, it is advisable to define how responses will be interpreted by the audit team (e.g. what proportion of affirmative actions is needed to consider a certain measure widely known among employees). It is also important to anticipate the option that the survey is completed only by a low number of employees, however, even a low response rate itself provides the audit team a valuable insight. It is key to communicate the findings in such a way that clearly indicates that they only reflect the sample of respondents, not the entire workforce.

Survey findings serve to evaluate the relevant indicators of prevention and resolving sexual harassment within the organisation, assess organisation climate concerning sexual harassment, and formulate specific recommendations for the organisation concerned. These findings form part of the audit report. In order to ensure clarity of audit report, it is not necessary to include responses to all questions of the survey, only those that provide key insights and serve as basis for recommendations.

Recommendations based on survey findings

Based on survey findings, the audit team formulates recommendations primarily aimed at removing barriers to reporting sexual harassment cases and other shortcomings of the existing system for resolving sexual harassment, increasing awareness on sexual harassment and existing measures in this area, as well as strengthening protection for most vulnerable groups within the organisation. Information on the prevalence of sexual harassment within the organisation provides the audit team strong evidence to justify the need for a meaningful change in this area toward the management of the organisation.

4.4 Proposing recommendations and consultations on their implementation

The final phase of audit is formulation of main findings and recommendations based on the audit, presenting them to relevant stakeholders within the organisation, and consulting on how the audited organisation can implement these recommendations. The audit team prepares an audit report[4] that includes the main audit findings and recommended measures in the area of preventing and resolving sexual harassment in the workplace.

The audit report includes:

- **A description of the audit process** – a list of internal policies subject to the analysis, the timing and location of interviews conducted, the period within which the internal survey was carried out, whether it was online or offline, and the number of responses;
- **Completed indicators** on the prevention and resolving sexual harassment within the organisation;
- **An evaluation of internal policies of the organisation** – a general overview of the policies, their strengths and weaknesses, and a summary of the current state (divided into five audit areas);
- **An evaluation of interviews** – key findings organised into five audit areas, including links between findings from the interviews and evaluation of internal policies (e.g. where the absence of clear regulation of sexual harassment in the internal policies of the organisation causes that the management explains the term differently and is thus unable to properly evaluate a specific unethical conduct within the organisation);
- **An evaluation of the internal survey** – description of the research sample (number of respondents, their gender and professional distribution), key findings structured across the five audit areas, including selected graphs and tables based on survey findings, and identification of strengths and weaknesses of the organisation in the area of sexual harassment based on survey responses;
- **A summary of findings** – it is advisable to integrate results from all audit phases to provide a comprehensive overview of the system

4 A report "Evaluation of existing measures for preventing and resolving sexual harassment and proposed recommendations in the area" (*original title "Vyhodnotenie existujúcich opatrení prevencie a riešenia sexuálneho obťažovania a návrh odporúčaní v tejto oblasti"*) was published within the pilot audit testing under the project VIOLET.

assessed. The summary should cover all areas but at the same time be concise and focused on the most important findings.

- **Recommendations for the organisation** – recommendations may be included within evaluation of each individual phase, including findings behind them, however, it is key to provide a consolidated list of recommendations at the end of the report.

Formulating recommendations

Recommendations are the **most important aspect of the audit**, as their quality often determines whether the organisation decides to implement them. They should be **concrete and specific** (tailored to the needs of the audited organisation) and supported by examples. Recommendations may result from one or more audit phases; their justification can increase the willingness of their implementation. It is advisable to divide them into the five areas and formulate them clearly without the need of additional explanation. It may happen, that certain relevant stakeholders within the organisation will only read this section of the report due to time constraints.

Recommendations should always **take into account circumstances and capacities of the given organisation**. Overly ambitious recommendations, e.g. not reflecting financial or personal capacities of the organisation concerned, may cause them being dismissed by the organisation outright, without even attempting to implement them. Proposing overly little ambitious recommendation may, on the other hand, make the implementation easier but fail to fully utilise the potential for meaningful change. It is, therefore, key to strike a balance between these two poles. It can be helpful to include alternative measures – from those ideal, through realistic to the minimum baseline measures (e.g. an ideal measure in the area of training would be regular general trainings for employees on the topic of sexual harassment, onboarding trainings for new employees, specialised trainings for managers, bystander intervention trainings; the minimum baseline measures would be regular general trainings, awareness raising on the internal policy on sexual harassment, and specialised trainings for managers).

Presentation of recommendations and consultation on their implementation

The final step of audit is the presentation of findings and recommendations to the management and consultation on their implementation. The aim is not only to explain the steps recommended and their rationale, but also to gather feedback and agree on the concrete forms of measures and timeframe of their implementation. You should invite management, including top management, heads of sections and teams, representatives of the legal and HR departments, and representatives of trade unions, to the presentation and consultation.

It is recommended to combine presentation of recommendation and the consultation on their implementation into a single meeting. During the meeting, the audit team presents the findings of the audit and recommendations derived from them. Subsequently, employees and representatives of the organisation give their feedback to the measures and changes proposed and assess which recommendations could be implemented immediately, which will require more time, assistance or support from the audit team. They may also indicate which measures the organisation does not intend to implement, while the audit team should explore whether these recommendations could be modified to make it more acceptable for the given organisation. Organisations audited may propose modifications of the recommended measures, and the audit team has the opportunity to assess the suitability of such adjustments.

Consultations on the specific form of measures may be conducted repeatedly if cooperation with the organisation continues. The follow-up consultations should be attended particularly by persons responsible for implementing the measures concerned, e.g. the legal department. Additional consultations concerning the specific form of measures may be conducted online or via email communication.

Key elements of the presentation of recommendations and consultation on their implementation:

- The audit team sends the contact person within the organisation the audit report together with the list of positions/people who should attend the presentation of the recommendations and consultation of their implementation – including management, persons responsible for implementing internal policies or involved in reporting and

resolving system for sexual harassment cases, representatives of trade unions and other relevant persons who participated in the interviews;

- The contact person, after agreeing on the date with the audit team, invites the selected persons to the presentation of recommendations and distributes the audit report to them sufficiently in advance (at least 5 working days) to allow the participants to familiarise themselves with the content and prepare any questions;
- It is recommended to organise the presentation of recommendations and, in particular, the consultation in person, as this allows better assessment of the organisational response to the recommendations presented and to respond more effectively to any possible resistance;
- The presentation of recommendations and consultation on their implementation last typically between two and three hours;
- It is recommended to present the recommendations in a visualised manner and include concrete examples of measures (e.g. a proposed definition of sexual harassment to be included in the code of conduct);
- During the presentation, it is crucial to pay attention to avoid sharing sensitive information from the interviews which could be linked to a particular person or that could be distressing (e.g. specific experiences with sexual harassment shared during consultation);
- Given that the presentation of recommendations is delivered to a broader audience, it is not necessary to present every single recommendation in detail, but rather focus on outlining the key changes required within the organisation (e.g. adopting the code of conduct that includes a definition of sexual harassment);
- Immediately following the presentation of recommendations and consultation on their implementation with the broader audience, you can offer additional meetings with the relevant departments, in particular the legal department, to discuss the proposed changes to internal policies in greater detail.

TIP: *Consultations provide good opportunity to address, in a sensitive manner, any potential concerns related to the introduction of new rules. If you also provide support during implementation, it is key to know the counterarguments, recognise individuals who may resist change, and at the same time build trust with management and other employees.*

How to address the resistance within organisation

Some audit findings and recommendations may be perceived as overly critical by some of the employees. If they feel that the audit team negatively evaluates their past work in the area of preventing and resolving sexual harassment, the employees or representatives of management may express resistance towards any changes.

Measures cannot be implemented without the willingness of the audited organisation and its openness to change. Striking a balance between proposed measures reflecting good practice and maintaining a good relationship with the organisation is one of the most difficult tasks of the audit team.

TIP: *It is important that the audited organisation does not feel blamed or criticised for their past work as being insufficient or wrong. The proposed recommendations should be communicated* ***as a form of support*** *offered to the organisation, helping it to improve how it prevents and resolves cases of sexual harassment. Sexual harassment occurs in organisations (which can be evidenced by survey data), and the proposed measures are intended to allow the organisation to respond more effectively. The aim of audit is to support the organisation, not to sanction it.*

It is therefore crucial to **acknowledge strengths** of existing policies and link recommendations to what is already functioning well within the organisation (e.g. if survey shows that employees trust their managers, these can be given more responsibilities within the system for reporting and resolving sexual harassment).

TIP: *When presenting the findings and recommendations across different audit areas, it is advisable to start with an assessment of the current situation, highlighting strengths of existing policies, and then continue with recommendations of the audit team.*

In many cases, organisational resistance can be sensed from management's reactions during the presentation of findings and recommendations or from slow and difficult communication with the organisation. Such response is not unusual, and it is crucial that the audit team does not perceive it as their failure or a source of frustration.

TIP: *If the organisation's management is not supportive of more substantive changes of internal policies, data on the prevalence of sexual harassment within the organisation can be a valuable tool. These data can help demonstrate the management that sexual harassment does occur within the organisation and that the proposed changes are intended to* ***help*** *the organisation to prevent future harassing conduct and address it more effectively.*

Resistance may also be caused by misunderstandings in communication. For this reason, we recommend that the audit team regularly calls the contact person within the organisation, in order to gather ongoing feedback and incorporate it into their work throughout the audit process.

TIP: *If during the presentation of findings and recommendations, the audit team perceives the management's response as rejecting, it is appropriate to discuss openly what would help the organisation implement the recommendations and what support the audit team can provide. Open communication allows the audit team to formulate recommendations in a manner to ensure sustainable change of internal policies, as the management better understands their importance and practical relevance for the organisation.*

4.5 How to support organisations in implementing measures for preventing and resolving sexual harassment in the workplace

Cooperation with the audited organisation typically concludes with the formulation of recommendations and consultations on their implementation. Within the project VIOLET, the audit was directly followed by expert support for the implementation of measures, including internal training.

The support provided by the audit team mainly consists of proposing amendments to existing internal policies or assisting in drafting new ones. However, this process is often very time-consuming. It is thus advisable to have **templates of selected internal policies** ready, particularly a code of conduct or a directive regulating the reporting and resolving sexual harassment cases. These templates can be shared with the audited organisation, or specific provisions can be incorporated into existing internal policies, which significantly accelerates the implementation process.

In order for the audit team to estimate how long the implementation of measures within the audited organisation will take, the audit team needs to understand the process of adopting internal policies within the organisation, including whether trade unions are involved and how, as well as any legal constraints that may limit possible changes.

TIP: *If you want that the trainings address changes to internal policies, it is important to allow the organisation sufficient time to implement them. If these changes cannot be formally adopted, it is advisable to clarify the key elements of the reporting mechanism (e.g. whether anonymous reporting will be possible, if ethics committee or other investigating body will be established, whether a designated person will be assigned new responsibilities, or whether managers will be given new roles and duties). Participants should familiarise themselves with these elements before the formal adoption of new policies.*

Training on the topic of sexual harassment

Training on sexual harassment is a key tool for its prevention. If an organisation decides to create or amend the system for reporting and resolving cases of sexual harassment, it is crucial to communicate such changes to all employees. Trainings provide an appropriate tool to com-

municate these changes and, at the same time, sensitise employees around the issue of sexual harassment.

In general, the training on sexual harassment shall address the following topics:

- Definition of sexual harassment, including specific examples of harassing conduct;
- An overview of impacts of sexual harassment on the targeted persons, teams they form part of, and the organisation as a whole;
- An explanation of reasons why employees may choose not to report incidents;
- Available data on the prevalence of sexual harassment within the organisation concerned (gathered via a survey), within the given sector, or in the workplace generally;
- The procedures for reporting and resolving sexual harassment within the given organisation and information about adopted or planned changes.

TIP: *It is advisable that the training includes an interactive activity for the participants, such as a case study. A case study uses a description of specific situation involving harassment (taking into account specificities of the given sector), followed by questions to be answered by the participants after group discussions.*

The specific content of training may vary based on the target group:

1. **Management of the organisation** (top management, legal and HR departments, quality management, audit/control department, etc.)
    - As these persons may be directly involved in the process of reporting and resolving sexual harassment, as well as in its prevention, training should go beyond the general content and focus also on developing skills required for preventing and resolving cases of harassment (how to communicate with the reported and harassing person, how to investigate cases respectfully and effectively, how to ensure confidentiality, prevent retaliation, implement sanctions and remedial actions, communicate the issue within the organisation, raise awareness and sensitivity within the organisation concerning sexual harassment, etc.). Resolving individual cases ad communicating with persons who have experienced sexual harassment is always content-specific and often challenging. Hence, the training should be designed

to equip management to resolve sexual harassment cases in a sensitive, transparent, and fair manner.

2. **Line managers**
   - This group often plays a key role in the system for reporting and resolving sexual harassment within the organisation, as they are often (formally or informally) the points of first contact for a person experiencing sexual harassment. As awareness or attention given to the issue within the organisation increases, it can be expected that more employees will be reporting sexual harassment. It is therefore crucial that line managers are able to communicate sensitively with all persons concerned (so as not to discourage reporting the case or causing further harm), understand principles of confidentiality, provide complex information about the system for reporting and resolving sexual harassment within the organisation, and knew their roles, responsibilities, and competences within this system. All these aspects should form part of training on preventing and resolving sexual harassment for this group.

3. **Employees**
   - This group includes persons who experience sexual harassment, may potentially face it in the future or may engage in the harassing conduct. Colleagues are also often the first persons to whom the affected individual confides with their experience. The aim of this training is to increase awareness and sensitivity, including understanding procedures for reporting and resolving sexual harassment within the organisation and possible sanctions. Training should therefore cover detailed explanation of different forms of sexual harassment, its impacts, reasons why people do not report, how to proceed if a person experiences or has knowledge of sexual harassment in the organisation, how does the organisation resolve sexual harassment, what is retaliation, as well as what sanctions for sexual harassment are being imposed within the organisation. It should also introduce basic techniques for communicating with someone who confides to be experiencing harassment, how to provide support, and so-called bystander intervention (what to do if harassment occurs in the workplace).

4. **Trade unions**
    - Compared to the abovementioned groups, a specificity of this training is focusing on strengthening the role of trade unions in this area, with an emphasis on a safer and more respectful working environment free from sexual harassment.

TIP: *The duration of training may vary based on the target group. The minimum recommended duration is 1.5 hours, however, a longer session (e.g. 3 hours) allows including more interactive activities, which help keeping participants engaged and allow them potentially to retain more information. In case of longer trainings, it is important to include breaks. The duration of training and the possibility of attending it during working hours are often subject to negotiation with the organisation concerned. It is important to accurately assess the organisation's and sectoral abilities (e.g. the ability to release employees during working hours). It is better to partially train 50 people than to run a full-length training for five participants only.*

5. Wellbeing of the audit team

Throughout the audit, particularly during the interviews, the audit team is exposed to risks of negative experiences of various types. Employees may confide their experience with sexual harassment with the audit team, the course of cooperation may be frustrating for the audit team, or they may experience harassment from respondents. It is therefore important to anticipate such situations and establish a plan for how to respond in advance.

Two main types of challenging situations tend to arise during interviews:

1. **Minimisation and denial of sexual harassment, and victim-blaming:** statements such as *"women provoke it by the way they dress"*, *"every woman should be able to stand up for herself"*, or *"nowadays, everything offends women"*, etc.

As addressed in Chapter 4.2 on conducting interviews, the role of the audit team is not to educate respondents, and therefore the audit team shall not engage in direct confrontation. However, listening to these types of statements can be highly frustrating. It is therefore advisable to provide the team with supervision or peer-support (intervision) after the interviews. This may have an informal and less organised form, e.g. setting aside time after interviews for debate and sharing (in-person or via online tools) or a more structured format, such as regular team debriefings, potentially involving an expert in psychology. Even if only one auditor conducts interviews on a given day, they should have an opportunity to share their experience with the audit team. The auditors also have access to a contact list of psychological support services, which they can use if necessary.

2. **Various forms of harassing behaviour towards the audit team members:** detailed descriptions of sexual experiences in the workplace, suggestive sounds or blinking, unwanted physical contact, inappropriate remarks, or attempts to initiate non-professional contact after the interview.

The abovementioned recommendation not to enter into confrontation with respondents excludes situations when personal boundaries of the auditor are being violated. In such cases, the member of the audit team should have an opportunity to clearly set boundaries. During preparation for audit, the audit team is informed that in case of inappropriate behaviour of respondents, they may conclude the interview, with or

without explanation. Auditors may also establish internal safety communication within the team – such as sending periodic messages to indicate their location within the building, confirm everything is proceeding safely, or signal the need for help. Subsequently, it is important that the auditor is given an opportunity to share their negative experiences with the team, be heard and get support, as well as to agree on the next steps with the team, including informing the audited organisation about the harassing conduct.

Proposed rules to enhance safety of the audit team:

- Neither the informed consent, nor other materials for respondents, include personal contact details of members of the audit team.
- Audit team members are informed prior to the audit that their safety is the top priority and that, if they feel threatened (based on their subjective assessment) or if their personal boundaries are violated, they should terminate the interview.
- Team members attend meetings and interviews in pairs, as minimum (despite the interviews being conducted individually), and keep each other informed about their progress and any incidents.
- If it is not possible to leave an uncomfortable (harassing) situation and the other team member is aware of it (e.g. via a message), they may intervene by entering the interview or interrupting the meeting.
- A procedure is in place to report uncomfortable situations during interviews, and the auditors are informed about it.
- In case of an incident, a designated member of the audit team communicates the situation to the organisation in order to prevent further contact or collaboration with the person responsible for harassing behaviour. Any communication concerning the incident is conducted to the extent agreed upon with the affected auditor.
- Reporting is not left solely to the affected person, but this person may get support within the audit team and by the broader institutional framework.
- Experience sharing within the audit team are planned in advance. It is not left to individual auditors to request it. Additional meetings of the audit team designed for sharing experience can be organised if needed.
- The audit team is provided with contacts to available psychological support services, if needed.

Annex No. 1 Template of informed consent for participating in an interview within the audit of internal policies on reporting and resolving sexual harassment in the workplace[5]

INFORMATION SHEET FOR OBTAINING CONSENT
TO PARTICIPATE IN THE AUDIT

INSTITUTION CONDUCTING INTERVIEW:
CONTACT DETAILS:
DESIGNATED PERSON:
COOPERATING INSTITUTION:

1. Basic information about the institution

The Slovak National Centre for Human Rights is an independent legal institution with a dual mandate: as a national human rights institution and a national equality body. As national equality body, it conducts research and independent investigations concerning discrimination, provides legal aid to victims of discrimination, including legal representation in anti-discrimination disputes, issues expert opinions on what constitutes discrimination, and delivers trainings and raises awareness on the negative impacts of unequal treatment.

2. Basic information about the activity

In cooperation with Name of the organisation, an internal audit of existing measures for preventing and resolving sexual harassment in the workplace is being conducted. Within the audit, interviews of the cooperating institution are being conducted.

The objectives of the interviews include:

- To gather information on the organisational climate and perception of sexual harassment in the workplace.
- To get understanding of current procedures, their effectiveness, strengths and weaknesses.
- To gather information that will serve as a basis for formulating recommendations and proposing appropriate measures for

5 National circumstances and legislation shall be considered, as the template is developed with reference to Slovak legal and institutional framework.

preventing and resolving sexual harassment in the workplace for the cooperating institution.

If, in connection with, during, or after the interview, you realise that any of the aspects covered have had a negative impact on you, we recommend seeking professional support. You may contact, for example:

- Helpline Nezábudka: 0800 800 566. A 24-hour, anonymous, free of charge helpline for individuals experiencing acute psychological distress or a difficult life situation.
- National Helpline for Women Experiencing Violence – call free of charge 0800 2012 2012 or send email to linkaprezeny@ivpr.gov.sk.
- IPčko – an anonymous and free helpline providing support in crisis situations. Call 0800 500 333 or send email to poradna@ipcko.sk.

If you have any questions or remarks concerning the interview and its content, the audit, or the project VIOLET in general, you may contact the responsible institution or the responsible person listed above.

3. Scope and use of information from interviews

For the purposes of the interviews, information concerning the respondent's job position and related responsibilities and competences, including those connected to resolving sexual harassment cases, is relevant. For their assessment, a written record is being produced during the interview. The written record will not be shared with third persons. The evaluation of interviews will form part of the summary audit report in a way that does not allow identification of individual views or experiences. All information that could lead to identification of individual respondents will be removed from the records and other outputs.

CONSENT TO PARTICIPATING IN THE INTERVIEW

1. I confirm that I have read and understood the information sheet dated of DD.MM.YY
2. I have had the opportunity to consider the information provided, ask questions, and receive satisfactory answers.
3. I understand that information collected during the interview will be used for audit purposes, as described in the information sheet.
4. I confirm that my participation in this interview is voluntary and that I am aware that I may withdraw freely at any time.
5. I understand that participation in this interview does not entitle me to any financial compensation.
6. I understand that the information I provide will be used in the outputs of the audit.
7. I agree to participate in this interview.

Respondent:

Name and surname:

Place:

Date:

Signature:

Responsible person:

Name and surname:

Place:

Date:

Signature:

Annex No. 2 Record sheet for interviews on internal policies and measures for preventing and reporting sexual harassment cases

The questions included in the record sheet serve as examples and should be adapted to allow for a natural and fluent conversation. Each question includes its objective, and the exact wording which can be modified to reflect specificities of the given organisation/sector.
The record sheet should provide a sufficient space to note down summarised responses, it is advisable to have additional blank sheets in case more detailed notes are needed.
If the interview is audio recorded, it is sufficient to capture basic information/facts, keywords, or observations and reflections of the auditor.

Where possible, interviews may be conducted by two auditors: one taking notes and the other leading the interview and asking follow-up questions based on responses.

Date:	
The interview is conducted by:	
Respondent's job position:	
Name of the organisation:	
1. Organisational culture and climate in the workplace	
Do you think sexual harassment is something that your employer/organisation should pay attention to? Why yes or why not? *Objective:* To introduce the topic and explore general attitudes towards including sexual harassment into relevant areas of internal organisational policies. *Risks:* The respondent may initially feel concerned to talk about the issue, react with rejection, or conversely, may open topics prematurely that are planned to be addressed later on in the interview.	
Based on your experience, what is considered sexual harassment within your workplace/team? • Is there any difference depending on whether the behaviour concerned comes from a colleague or from a client?	

Objective: To identify which conduct would be considered sexual harassment and which not; to assess the extent to which workplace relationships are sexualised (i.e. if a tolerated standard includes e.g. joking or discussing sexual topics); and to determine whether sexual harassment by clients is normalised as a "routine" part of the job.	
Are you aware of whether the topic of sexual harassment is anyhow regulated in the internal policies? • Does your organisation have a code of conduct? If not – do you think it would be beneficial? • If yes – does it also address sexual harassment? • Is this document used in practice? (e.g. when resolving conflicts in the workplace, addressing unethical behaviour, submitting disciplinary complaints, etc.) *Objective*: To assess the awareness of internal documents and their content. *Note*: **Before conducting the interviews, it is necessary to familiarise yourself with internal policies.** However, do not correct the respondent during the interview. If they themselves ask the correct answer, it is appropriate to respond them after the interview.	
Have you come across the term "zero tolerance of sexual harassment"? What do you understand by it? *Objective*: To assess familiarity with the concept of zero tolerance, awareness of whether it is included in internal documents (if relevant), the willingness to address sexual harassment cases consistently, and any potential resistance to such approach. • Can you imagine this approach being applied in your organisation? *Note*: The follow-up question concerning the application of zero tolerance policy is only relevant if the respondent is familiar with the concept.	

How do you think employees would respond to increased attention to prohibition of sexual harassment, for example encouragement to report such cases? *Objective*: To understand the general attitude within the organisation concerning raising awareness of sexual harassment and the need of resolving it. If possible, to find out whether there are specific individuals, a department, or professional groups that tend to downplay sexual harassment and from whom resistance to new measures might be expected.	
According to you, is a certain level of sexualised behaviour a common part of workplace communication and relationships? I mean, for example jokes, talking about sex, or entering someone's personal space. • Do you think there are colleagues who might find this uncomfortable? If so, do they speak up in such situations? • Do you perceive that certain groups of employees are more likely to experience potentially harassing behaviour than others? *Objective*: To assess the extent to which sexually suggestive joking, comments etc. are common within the organisation, whether it is perceived negatively if someone objects sexual harassment or, on the contrary, if responses to such objection are respectful. To identify whether there are groups of employees (e.g. interns, younger colleagues, or colleagues from a specific department) who are at higher risk of experiencing such behaviour. *Note*: Respect for personal boundaries and the ability to communicate without negative consequences are key conditions for preventing sexual harassment.	
Do you or other members of management actively encourage employees to report sexual harassment cases? *Objective*: To identify whether reporting and resolving sexual harassment is supported by different levels of management within the organisation.	

Risks: Respondents in lower managerial or non-managerial positions may find this question unexpected. Its wording should be adjusted to the job position. If respondents are convinced that no such situation has occurred so far, you can pose it as a hypothetical question.	
Do you think there is sufficient trust within the organisation for people to openly address problems or conflicts in the workplace? *Objective*: To assess whether insufficient trust within the organisation may be one of the barriers to reporting sexual harassment; and to identify whether there are persons who are trusted more than others (and vice versa). To explore whether there has been past situation in which this trust was breached.	
2. Training and awareness	
Do you have access to information about what constitutes sexual harassment, how to protect yourself from it, or how to report it, in your workplace? • If yes, in what form? *Objective*: To determine whether the employer has included the issue of sexual harassment as part of internal trainings, whether educational materials and information about internal procedures are available (e.g. during staff meetings, onboarding training, information boards, or via email).To identify alternative sources of information used by employees (e.g. social media, media) and whether they discuss the issue within their teams.	
Do you have knowledge of any trainings or educational activities on sexual harassment or related topics that have been conducted? Could you please tell us more about them? • When they took place; • Who they were intended for (management, professional staff, support/technical staff); • How employees were informed about them;	

• Whether they were mandatory/voluntary; • Their duration; • Who delivered the training (external/internal trainers); • What the content of the training was. *Objective*: To identify what types of trainings have been conducted over the past 5 – 10 years (maximum), and whether the employers were involved in any related projects relevant to this topic. Related topics (e.g. violence against women, discrimination in general, workplace bullying) are also of interest. To further explore the conditions under which employees could participate (during working hours, only certain professions, etc.). To gather more detailed information about the content (if relevant), e.g. if it addressed sexual harassment in general, legal protection mechanisms, reporting and resolving procedures.	
Did you personally participate in this training? • If not, why? • How did employees react to the training? Did they consider it a useful use of their time? • Did the training meet its objectives/expectations? • Did you notice any impact of these trainings (e.g. an increase in reported cases)? *Objective*: To assess employees' attitudes towards training and internal educational activities within the organisation. To capture previous experience regarding the impact of training on organisational change.	
3. Reporting and handling of the complaint	
Is there a system for reporting sexual harassment cases in your workplace? Do you consider its current setup to be sufficient? Why? • How should a case be reported in your organisation? • To whom is it reported, or who is the first point of contact for reporting? • What should happen next in the process?	

Objective: To assess awareness of established reporting procedures under internal regulations and to identify potential areas for improvement of the system. *Note*: Before conducting interviews, it is necessary to familiarise yourself with the internal regulations.	
Based on your experience, are colleagues aware of the possibilities and procedures for reporting sexual harassment? • For example, according to you, do employees know how to proceed, whom to approach, and what steps to expect next? • Is this information stated only in internal policies, or are they also summarised elsewhere? • Have these procedures been discussed during team meetings or when addressing a specific issue? • Sometimes, the language of policies may be complex, is the reporting process also explained somewhere in more accessible/ "user-friendly language"? • Where exactly? (on notice boards, in leaflets) *Objective*: To gain a more detailed understanding of the level of awareness of reporting procedures established in accordance with internal policies from the point of view of middle and lower management. To assess accessibility and identify areas for improvement in raising awareness of the established procedures. *Risks*: The question is intended particularly for lower and middle management. However, respondents may not have a clear opinion whether their colleagues are sufficiently informed and whether they would know how to proceed. If follow-up questions do not help, move on to another area. *Note*: Before conducting the interview, it is necessary to familiarise yourself with the internal policies of the organisation.	

In your opinion, is this mechanism equally accessible to everyone, or are there colleagues who might not use the established procedure? • Is it required to submit a report in writing as a formal document? • Is it possible to file an anonymous report? • Do employees have the opportunity to seek advice before deciding to file a report? *Objective*: To assess the accessibility of the reporting system in different situations – the possibility of informal resolution, anonymous reporting, different reporting channels (via email, post, in-person, by phone).	
Is this reporting mechanism used in practice? Are you aware of any case? (How many cases can you recall?) • Are you aware also of cases that have not been reported? In your opinion, why the persons concerned decided not to report them? • Do you think colleagues may be afraid to report sexual harassment? If so, why? *Objective*: To assess whether the procedure applies in practice in line with internal policies or if there is an alternative, informal strategy for reporting sexual harassment cases. To identify barriers to reporting (e.g. lack of trust, fear of negative response).	
Going back to the reported cases, how were they handled? What happened next after reporting? • How many people, and in what roles, were involved in the investigation? • How was the investigation conducted and how was evidence gathered? • Were confidentiality of the reported case and the person reporting maintained, of did the case become widely known? • How was the protection of the reporting person ensured? (victim-perpetrator confrontation, methods for gathering information from the reporting person, protection of their identity during initial stages of the investigation)	

• How long did the investigation process take? • Was a trade union involved in the process? • Was the reporting person regularly kept informed about the ongoing processes? Did the reporting person know what the overall procedure looks like and possible ways of resolution? *Objective*: To gather more information about how reported cases of sexual harassment are handled, in particular with respect to observing the principles of confidentiality, transparency, and ensuring that the experience of the affected person is not minimised.	
What outcome or resolution did the process result in? • Who decided the outcome/resolution? • Do you think that the reporting person was satisfied with the outcome? • Did the reporting person experience any negative changes in their working conditions? (e.g. reassignment, changes in shifts). • Are you aware of whether the process and outcomes of such investigation are documented, or whether any follow-up is conducted after a certain period to assess whether the situation had been remedied? *Objective*: To assess the effectiveness of measures adopted based on the reported case of sexual harassment, and to verify whether any form of unjustified retaliation occurred.	
If someone in the organisation were to be designated as a trusted person (the point of first contact, who gathers information, gives consultations, supports individuals through the reporting and resolution process, and ensures confidentiality), who do you think it should be? • Is there anyone who you would not trust in this role? *Objective*: To map out a network of persons within the organisation who are generally trusted (and on the contrary, who are not).	

4. Sanctions and resolving the situation	
If the organisation concludes that a certain behaviour can be considered sexual harassment, what is the next step? Are sanctions in cases of sexual harassment regulated in any internal policy? If yes, what does the policy exactly stipulate? Does the established rule apply in practice? Objective: To assess awareness of whether and in what sense sanctions are addressed in connection with sexual harassment (e.g. if it is considered a violation of work discipline). To assess awareness on internal policy on sanctioning sexual harassment. *Risks*: Persons who were not directly involved in handling a case may not have information on sanctions are imposed in practice.	
In your opinion, are the sanctions established proportionate and effective? Why? • What factors are taken into account when deciding on a sanction (e.g. repetition, severity, duration of the behaviour, position of the perpetrator, etc.)? • Have the sanctions been applied consistently in all cases so far? • Does sanctions and measures imposed take into account whether the behaviour is repeated? *Objective*: To assess perceptions of application of the internal policy on sanctioning sexual harassment in practice. *Risks*: Persons who were not directly involved in handling a case may not have information on how sanctions are imposed.	
Is the opinion of the affected person or other involved person considered when determining remedial actions? • Did the affected person, or other involved person, have an opportunity to express what they would consider appropriate, or under what conditions they would feel safe?	

Objective: To assess whether a respectful approach is applied in handling sexual harassment and implementing remedial actions. To assess whether the safety and best interest of the affected person are prioritised when introducing remedial actions.	
5. Monitoring	
Are you aware of regular organisational mapping or monitoring of occurrence of sexual harassment in the workplace? Do monitoring activities or surveys on other topics take place in your organisation? For example, concerning workplace climate in general, employee satisfaction with working conditions, etc.? If yes: • Under what circumstances were these monitoring activities introduced? • Who prepares and evaluates them? • How are they distributed? • How do employees perceive them? • Were you informed about the results? • Did anything change as a result of the findings from the monitoring? *Objective*: To assess awareness of whether the organisation has conducted any recent (approximately within the last 5 years) surveys on the prevalence of sexual harassment – either as a standalone survey or as part of broader monitoring of employee satisfaction. To assess the perception of the need of such a survey and its impact on functioning of the organisation.	
If monitoring of the prevalence of sexual harassment in the workplace is not in place, can you imagine that such questions would form part of regular questions of regular surveys? • Do you see any room for it? How would you suggest organising it? • Would colleagues be more willing to respond to online or offline forms – would they trust that anonymity is preserved?	

• Could there be other obstacles to implementing such monitoring? *Objective*: To assess perceptions of internal monitoring and evaluation – openness to completing questionnaires and views on the effectiveness of such a tool.	
Other comments	

Annex No. 3 Employee survey

Experience of sexual harassment and workplace climate

Dear respondents,

We would like to invite you to complete a survey concerning organisational climate in your workplace. Completing the survey should not take more than 20 minutes of your time.

Your employer, in cooperation with the Slovak National Centre for Human Rights (SNCHR), has decided to assess how well the preventing measures and procedures for resolving sexual harassment are set up. Therefore, the questions address different types of unwanted behaviour as well as the creation of a respectful working environment.

The anonymity of responses is guaranteed by SNCHR. Only SNCHR team will have access to the responses for the purposes of their analysis. Your employer will receive only overall findings and recommendations. Your responses cannot be traced back to you personally, and completing the survey will not have negative consequences on your working conditions.

Your participation in the survey is voluntary; however, the more responses collected the more targeted recommendations can be addressed for your workplace. Your sincerity is key, as it will help us better understand the situation and contribute to improving working conditions.

Instructions for completing the survey:

Some questions in the survey are directly linked – this will always be indicated before the relevant question. If a question starts e.g. by “If yes”, you should only answer it if you responded “Yes” to the previous questions. If you answered “No”, you should skip the question.

Thank you for your time!
SNCHR Research team

Workplace training

The first part of the questionnaire addresses questions concerning trainings and education in the area of sexual harassment. We would like to know, whether you have had the opportunity to participate in such training and what information it provided.

1. In the past 5 years, have you participated in any training at your workplace on preventing sexual harassment, or in any other training that addressed the topic?
   a. yes
   b. no

The following questions are linked to your previous answer

2. If no: Why did not you participate in such training? Please select one option.
   a. such training did not take place at all
   b. I was not informed about such training
   c. the training was intended only for selected persons or professions
   d. it was voluntary and I was not interested

3. If yes: if you have participated in such training in the past, what was the main reason for your participation?
   a. the training was mandatory for all employees (including non-healthcare staff)
   b. the training was mandatory only for certain professions
   c. the training was voluntary, and I attended based on my own initiative
   d. the training was voluntary, but I felt pressure to attend
   e. the training was voluntary and my employer encouraged me to attend
   f. I don't know

4. If yes: What information was included in the training? You may select more than one option.
   a. how to recognise sexual harassment
   b. why is sexual harassment considered unacceptable
   c. how to proceed when reporting sexual harassment
   d. Other: _____

Organisational culture and climate at workplace

The second part focuses on organisational climate and workplace policies, as well as on how sexual harassment is addressed. We are interested to learn your opinion about the established rules and procedures, and how you perceive the overall atmosphere in your workplace.

5. In your opinion, do internal documents at your workplace (e.g. Code of Conduct or Work Regulations) address the issue of sexual harassment?
   a. yes
   b. no (continue to question No. 8)
   c. I don't know (continue to question No. 8)

The following questions are linked to your previous answer

6. If you answered yes to question 5: What do these documents state about sexual harassment? (open-ended answer)

7. If you answered yes to question 5: Do these documents include an explicit prohibition of sexual harassment in relation to patients and external persons?
   a. yes
   b. no
   c. I don't know

8. Please indicate which behaviour would you consider sexual harassment (if it is unwelcome to the person concerned). You may select more than one answer.
   a. telling jokes or sharing stories with sexual undertones
   b. commenting on a person's physical appearance
   c. degrading comments about men or women in general (e.g. sexist remarks)
   d. sending unsolicited images or texts with sexual undertones
   e. attempting to initiate a relationship despite rejection
   f. invading personal space
   g. unsolicited physical contact or attempts of such contact
   h. implying or offering benefits in exchange for sexual activity
   i. attempted sexual assault or sexual assault/rape

9. Does your employee apply any of the following approaches? You may select more than one option.
   a. zero tolerance for sexual harassment is embedded in organisational documents
   b. the employer does not trivialise complaints of sexual harassment
   c. sufficient attention is given to the issue of sexual harassment
   d. information about sexual harassment is included in the onboarding process

10. Does management encourage employees to report sexual harassment cases?
   a. yes
   b. no
   c. partially
   d. I don't know

11. Which of the following statements do you agree with? You may select more than one option.
   a. Unwanted sexualised behaviour occurs in the workplace.
   b. If someone finds sexualised behaviour uncomfortable, they can openly communicate this without fear of negative judgement from colleagues.
   c. There is trust in the workplace that reported cases will be properly investigated.

Reporting

This section focuses on reporting cases of sexual harassment. We are interested in your experience –your understanding of available options and procedures, or any real situations you may have faced. Your responses are anonymous and will help us better understand how the reporting system functions in your workplace.

12. If you decided to file a formal complaint, would you know how to proceed?
   a. yes
   b. no (continue with question No. 16)
   c. I am not sure

The following questions are linked to your previous answer

13. If you answered yes to question 12: Please describe how you would proceed when filing a formal complaint. (open-ended answer)

14. If you answered yes to question 12: Do you consider the reporting mechanism and the procedures for resolving sexual harassment in your workplace to be confidential?
    a. yes
    b. no
    c. I don't know

15. If you answered yes to question 12: In your opinion, are the reporting mechanisms and procedures for resolving sexual harassment in your workplace appropriately set up?
    a. yes
    b. no
    c. I don't know

16. Is there a designated person in your workplace whom you can address questions concerning sexual harassment and your rights?
    a. yes
    b. no
    c. I don't know

17. Is it possible to file a formal complaint about sexual harassment anonymously in your workplace?
    a. yes
    b. no
    c. I don't know

18. In the past three years, have you experienced any of the following situations in your current job? Please select one option for each situation indicating how many times you have experienced it (mark "x" in the appropriate column)

	It has never happened to me	**It has happened to me once**	**It has happened to me more than once**
Someone was telling sexual stories or jokes that were offensive.			
Someone tried to involve you in conversations about sexual topics even though it made you uncomfortable.			
Someone commented on your appearance in a way that made you uncomfortable.			
Someone used inappropriate or obscene sexual gestures.			
Someone attempted to initiate a romantic or sexual relationship with you despite your rejection.			
Someone humiliated you because you are a man or a woman.			
Someone implied that you would receive benefits (e.g. career growth) if you engaged in sexual relations with them.			
Someone threatened you with negative consequences if you did not engage in sexual relations with them.			
Someone touched you in an unwelcome or inappropriate way (e.g. around the waist, on the buttocks, shoulders, etc.).			
Someone leaned over you in an uncomfortable way or stood too close, invading your personal space.			
Someone treated you badly after you rejected their sexual proposals.			
Someone sexually assaulted you or attempted to do so.			

19. If you were to experience (or already experienced) any of the situations listed above, would you confide in someone in your workplace?
    a. colleagues
    b. direct supervisor
    c. human resources department
    d. management
    e. a person designated to handle sexual harassment cases
    f. a representative of a trade unio
    g. another person who I trust
    h. no, I have not confided in anyone
    i. I prefer not to answer

20. If you have experienced any of the above listed situation, when did it happen?
    a. within the last 12 months
    b. 1 to 3 years ago
    c. more than 3 years ago
    d. I have never experienced anything like this (continue with question No. 30)

The following questions are linked to your previous answer

21. If you answered a, b, or c to question 20: When and in what context did this situation occur? (you may select more than one option)
    a. during working hours in the workplace
    b. during informal events (e.g. team-building activities)
    c. during a business trip
    d. outside working hours and the workplace (e.g. on the way home)
    e. I prefer not to answer

22. If you answered a, b, or c to question 20: Who behaved this way towards you? (you may select more than one option)
    a. colleague at a similar level
    b. direct supervisor
    c. colleague in a subordinate or lower-ranking position
    d. client/patient
    e. I prefer not to answer

The following questions are linked to your previous answer

23. If you answered a, b, or c to question 20: In the past, have you filed a complaint or otherwise informed designated persons about sexual harassment in the workplace?
    a. yes
    b. no (continue with question No. 29)
    c. I prefer not to answer

The following questions are linked to your previous answer

24. If you answered yes to question 23: Were you regularly informed about next steps in resolving your complaint?
    a. yes, I had sufficient information
    b. yes, but only partially
    c. no
    d. I prefer not to answer

25. If you answered yes to question 23: Was the process of resolving your cases recorded in any of the following forms? (you may select more than one option)
    a. in the form of minutes
    b. through a notification of the outcome of investigation and measures taken
    c. through a record/log of receiving the report/complaint
    d. there are no written records
    e. I don't know
    f. I prefer not to answer

26. If you answered yes to question 23: How would you evaluate the process of investigating your case? (you may select more than one option)
    a. confidential – information was not shared with others
    b. anonymous – no one found out that you have submitted the complaint
    c. transparent – the outcomes and measures taken were clearly explained
    d. none of the above

27. If you answered yes to question 23: How would you describe your satisfaction with the outcome of the process? (open-ended answer)

28. If you answered yes to question 23: Did you feel that submitting the complaint had any negative consequences for you? If yes, please describe them. (Then continue to question 30)

29. If you answered no to question 23: If you did not report, what were the reasons?
    a. I did not consider the situation serious
    b. I did not know whom to report it to
    c. I handled it myself
    d. the situation did not repeat or stopped over time
    e. I was afraid it would become known among colleagues
    f. I was afraid I would not be believed
    g. I did not want to be accused of trying to harm someone
    h. I was afraid of negative consequences at work (e.g. reassignment, worsening relationships)
    i. other:

Sanctions and remedy

This section focuses on sanctions and measures related to sexual harassment in the workplace. We are interested to know whether you consider them effective and fair.

30. Do organisational documents include sanctions against individuals who commit sexual harassment?
    a. yes
    b. no (continue with question No. 32)
    c. I don't know (continue with question No. 32)

The following questions are linked to your previous answer

31. If you answered yes to question 30: What is your view of the sanctions included in the organisational documents? (you may select more than one option)
    a. they are applied equally to everyone
    b. I consider them effective

c. they are proportionate to the severity of the conduct
d. Other: _____

32. Do you know who decides on the sanctions in your workplace?
    a. yes
    b. no

Personal characteristics

At the end of the questionnaire, you will be asked about certain personal characteristics. These data will not make it possible to identify any individual person, but they will help us analyse patterns and relationships based on these characteristics.

33. What is your profession?
    a. doctor
    b. nurse or midwife
    c. other healthcare staff
    d. other (please specify)

34. What is your age? (give number)

35. What is your gender?
    a. female
    b. male
    c. other

36. Do any of the following characteristics apply to you? (you may select more than one answer)
    a. I am a single parent/provider
    b. I identify myself to be part of a nationality other than Slovak
    c. I have a citizenship other than Slovak
    d. I am a person with disability
    e. I have a sexual orientation other than heterosexual
    f. none of the above