



**Institut Català  
d'Arqueologia Clàssica**

**December 2020**

# **PROTOCOL AGAINST SEXUAL HARASSMENT**

Catalan Institute of Classical Archaeology  
protocol for preventing, identifying and  
taking action to combat sexual  
harassment and harassment based on  
sex, gender identity and/or sexual  
orientation

NOTE: This protocol for addressing sexual harassment was presented at the meeting of the Board of Directors of the Catalan Institute of Classical Archaeology on 11 December 2020 for review and approval.





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## INTRODUCTION

A little over two years ago, in September 2018, at the 25th Conference of the European Association of Archaeologists in Barcelona, a study on sexual harassment in the field of archaeology was presented which focused on academia, universities and fieldwork (which is very common in archaeology). The event brought together thousands of specialists from across the globe.

The data from the study included numerous testimonies, primarily from Spain, but also from Catalonia. This opened a Pandora's box, a complex situation that had remained hidden away in silence for too long, and brought visibility to a problem that seriously affects women – especially young women – during their education and when starting their research careers.

A year earlier, the media had reported allegations of sexual abuse lodged by students on archaeological excavations at a Spanish university. University archaeology was no longer the safe haven many believed it to be.

The Catalan Institute of Classical Archaeology protocol for preventing, identifying and taking action to combat sexual harassment and harassment based on sex, gender identity and/or sexual orientation presented here is the result of awareness of this very real social scourge, which is gradually gaining visibility in the field of archaeology and in world of research as well.

CERCA (Research Centres of Catalonia) is a public entity of the Government of Catalonia of which ICAC is a member. It has been particularly active in the creation of protocols to prevent gender-based violence for the purpose of shedding light on potential problems and provide the means necessary to manage them.

In 2017, ICAC established its Equality Committee, whose general goal is to ensure real and effective gender equality in all areas of the institute. The committee's mission is to prevent and compensate for any gender-related conflicts in activities organised by the institution and the activities it is involved in. It was this committee that undertook the enormous task of drafting this document with the advice and guidance of an expert in gender studies, Elena Apilániz Piniella.

As a CERCA centre which in recent years has been immersed in a process of remarkable growth and internationalization, ICAC sought to produce a document in line with our current reality and the field of archaeology. ICAC's activities are becoming more and more delocalised, and since ICAC currently has research projects on three continents (Europe, Africa and Asia), it increasingly works in diverse and changing cultural contexts. So, the protocol is not designed exclusively in reference to the institute's headquarters in Tarragona or the Rovira i Virgili University campus, especially in these times of remote working, which is a mode of work that is here to stay.

Prevention, identification, action: these are the three key areas. Knowledge and awareness of the need to significantly change attitudes are essential for guaranteeing the inalienable right to work in a safe and respectful environment.

Josep Maria Palet, director of the Catalan Institute of Classical Archaeology

Tarragona, 3 December 2020

## 1. BACKGROUND

The Catalan Institute of Classical Archaeology consortium (ICAC) is a CERCA member established by the Government of Catalonia and Rovira i Virgili University. Its purpose is research, advanced training and dissemination of knowledge of classical civilisations and culture. It is a public legal entity of institutional nature and is deemed to have legal personality for the pursuit of its objectives.

The institute's work is founded on collaboration and synergies with universities and research institutions involved in the same areas of interest in Catalonia, with the aim of becoming an international scientific benchmark in its field. In its role as a research centre, it pursues lines of research, develops research programmes and employs highly qualified research staff.

Prior to the drafting of this protocol, on 25 July 2017, ICAC approved its Gender Equality Action Plan, which includes the design of a protocol to handle incidents and conflicts related to gender equality (Measure 3).

In March of 2015, ICAC was granted the HR Excellence in Research accreditation and logo, in accordance with the Human Resources Strategy for Researchers (HRS4R) of the European Commission. This distinction is founded on two central tenets:

- a) An Action Plan (2015–2018) to implement human resources policies in accordance with the European Charter for Researchers and the Code of Conduct for recruiting researchers for the Catalan Institute of Classical Archaeology.
- b) OTM-R, which refers to an open, transparent and merit-based recruitment process. It is based on the European Charter for Researchers and the Code of Conduct published by the European Commission in 2005.

ICAC's Code of Ethics, approved by the Board of Directors on 20 July 2017, is a model for the entire ICAC community. Its obligatory nature is inherent to the moral foundations that justify it. Its strength rests solely on the commitment of all members of the community to respect a set of common values and principles.

The CERCA Code of Conduct, approved by the Board of Directors on 27 June 2019, also defines a framework to ensure commitment to best scientific and managerial practices at CERCA centres.

In February 2020, the Equality Committee began drafting the action protocol to combat violence, sexual harassment, and harassment based on sex, gender or diversity in the workplace. As its first action, a questionnaire about sexism in the workplace was created and sent to the entire ICAC community. The information collected by means of the survey served as a point of departure and provided a snapshot of the reality of the institute and its professional activities.

In September 2020, ICAC hired Elena Apilánez, a graduate in pedagogy with extensive professional experience in international cooperation and an illustrious academic career focusing on studying the feminist movement. She provided theoretical and practical training to the Equality Committee for the preparation of this document.

On 11 December 2020, ICAC's Board of Directors approved the 'Catalan Institute of Classical Archaeology protocol for preventing, identifying and taking action against sexual harassment and harassment based on sex, gender identity and/or sexual orientation', which largely reflects

the content of the aforementioned documents. ICAC aims to extend the scope of the protocol to the entire institute so that it has a single protocol of reference.

## 2. Rationale and justification

Every person has the right to be treated equally and without discrimination in the workplace, the right to health, respect and dignity. Sexual harassment, harassment based on sex, sexual orientation and/or sexual identity violate these principles. ICAC condemns these behaviours, and, as such, endeavours to take actions necessary to prevent them from being accepted and to provide the means to prevent them from occurring.

Several international bodies have spoken out against this type of conduct. In 1958, the International Labour Organisation (ILO) approved Convention No. 111, which includes sex discrimination as a type of discrimination that aims to nullify or hinder equality of opportunity or treatment in employment and occupation. The 1985 Resolution on Equal Opportunities and Equal Treatment for Men and Women in Employment (71st ILO Session) stated that sexual harassment in the workplace is detrimental to working conditions and the prospects for advancement of workers. Therefore, policies that promote equality must include measures to combat these behaviours.

The United Nations has included sexual harassment and harassment based on sex in various documents, relating them to violence against women as a specific area of action. On 18 December 1979, the United Nations General Assembly adopted the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW). It entered into force as an international treaty on 3 September 1981 after being ratified by 20 countries, including Spain in 1983.

This treaty constitutes a landmark legal framework of the highest international standing. It establishes the principles of equality and non-discrimination as the basis for developing new regulations and expanding other regulatory aspects. In its preamble, CEDAW explicitly acknowledges that 'extensive discrimination against women continues to exist', and emphasizes that such discrimination "violates the principles of equality of rights and respect for human dignity". As defined in article 1, discrimination is understood as "any distinction, exclusion or restriction made on the basis of sex (...) in the political, economic, social, cultural, civil or any other field.'

CEDAW gives positive affirmation to the principle of equality by requiring States Parties to take 'all appropriate measures, including legislation, to ensure the full development and advancement of women, for the purpose of guaranteeing them the exercise and enjoyment of human rights and fundamental freedoms on a basis of equality with men' (Article 3).

A few years later, in 1994, the United Nations General Assembly adopted the Declaration on the Elimination of Violence against Women (Resolution 48/104), which recognises that all forms of gender-based violence in its different manifestations constitute flagrant violations of fundamental rights and urges states to implement all necessary measures to eradicate violence against women.

The Declaration of the Council of the European Union of 19 December 1991 on the implementation of the Commission Recommendation on the Protection of the Dignity of



Women and Men at Work (including the Code of Practice to Combat Sexual Harassment) is the European benchmark standard for prevention in this area.

In this respect, Directive 2002/73/EC of the European Parliament and of the Council of 23 September 2002, amending Council Directive 76/207/EEC on the implementation of the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions, states that sexual harassment is deemed to be discrimination on grounds of sex in the workplace when unwanted conduct related to sex occurs with the purpose violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment, especially if the affected person rejects or submits to this conduct as a basis for a decision affecting that person.

Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment states that sexual harassment is contrary to the principle of equal treatment between men and women and constitutes discrimination on the grounds of sex for the purposes of this Directive.

In Spain, the Spanish Constitution (CE) obliges public authorities to go beyond mere formal equality by promoting conditions for equality to be real and effective (Articles 14 and 9.2).

Organic Law 1/2004 of 28 December on measures to comprehensively protect against violence against women was the first law to set out an exhaustive system for guaranteeing the rights of people subjected to gender-based violence. It implemented a series of very diverse legislative measures, including awareness-raising, and prevention and detection measures in the educational arena, with the aim of preventing and eradicating gender-based violence.

Meanwhile, Organic Law 3/2007, of 22 March on effective equality between women and men stipulates that public administrations must promote working conditions that prevent sexual harassment and harassment based on sex and establish specific procedures to prevent and address any complaints or claims that may be made by people who have been subjected to such harassment (Article 48.1 and final provision 6 of the organic law).

In Catalonia, Law 5/2008 of 24 April on the right of women to eradicate violence against women expands the scope of protection beyond violence in affective relationships to all forms of gender-based violence. This is also the approach adopted by this protocol, which is why it also adopts the nomenclature of the Catalan law and refers to 'violence against women'.

Law 11/2014 of 10 October guaranteeing lesbian, gay, bisexual, transgender and intersex rights to eradicate homophobia, biphobia and transphobia aims to 'establish and regulate means and measures to give effect to the right to equality and non-discrimination on grounds of sexual orientation, gender identity or gender expression in the public and private spheres.' Article 21.a guarantees the right to non-discrimination in the workplace on the grounds of sexual orientation and gender identity (hiring and working conditions).

Meanwhile, Law 17/2015 of 21 July on effective equality of women and men provides that public authorities must adopt the necessary measures and strategies to ensure the equality of women and men in a democratic society, and especially to comprehensively combat all forms of gender-based violence, especially violence against women and sexist, misogynist and discriminatory acts (Article 3). Article 18.3 of the same law stipulates that the institutions of the Government of Catalonia and its affiliated and subordinate public bodies must approve a protocol for the prevention of sexual harassment and harassment based on sex within two years of the entry into force of this law.

ICAC is a research institute associated with Rovira i Virgili University (URV), and, as such, shares the aims of the Catalan universities, whose fundamental objective is to transmit the civic and social values inherent to a democratic society (Article 3 of the Catalan Law on Universities) and which must serve as social benchmarks for genuine, effective respect of fundamental rights. Universities must anticipate and eradicate sexual harassment and harassment based on sex to advance towards the full participation of members of the university community in academic activities and to guarantee respectful coexistence among all.

University institutions, in turn, must preserve the rights of those involved in this type of situation as well as the rights to dignity, to free development of personality, to physical and moral integrity, to non-discrimination based on gender or other personal or social circumstance, to privacy and integrity, and to other rights regulated by international regulations, the Spanish Constitution, and the Statute of Autonomy of Catalonia.

The Catalan Institute of Classical Archaeology seeks to provide a safe, respectful working environment for all. ICAC is therefore committed to taking decisive action to protect people affected by situations of sexual harassment and to promote preventive measures and institutional channels for reporting and responding to such situations. To this end, ICAC offers its community a mechanism that outlines the procedure for taking action in the event of a situation of harassment such as those defined in this protocol.

The main objectives of this protocol include preventing, assisting and advising those who have been harassed, guaranteeing rigorous and confidential support, and providing those affected with avenues for fast, high-quality resolution and guidance in dealing with the problems they have encountered.

The aim of this document is to respond to all possible situations that may reveal sexist behaviour in ICAC's academic, research and work activities, and to build a society that respects the values of equality and diversity, preventing and resolving situations of sexism and violence against women in all its forms and manifestations within the scope of the institute.

### **3. Institutional commitment and objectives**

#### **3.1. Institutional commitment**

The Catalan Institute of Classical Archaeology declares its policy of zero tolerance for sexual harassment and harassment based on sex, gender identity and/or sexual orientation, and therefore undertakes to:

- a) Formally declare and raise awareness of its rejection of all types of sexual harassment and harassment based on sex, gender identity and/or sexual orientation in all forms and manifestations.
- b) Promote a culture of preventing sexual harassment and harassment based on sex, gender identity and/or sexual orientation through training, information and awareness-raising activities throughout the entire ICAC community.
- c) Report, investigate and penalise any conduct that may constitute sexual harassment or harassment based on sex, gender identity and/or sexual orientation.

- d) Assist and advise those who have been the object of sexual harassment or harassment based on sex, gender identity and/or sexual orientation.

This commitment is public and will be communicated to all personnel, management units, services, departments, collegial and other governing bodies in the institute's organisational chart as well as to any third parties linked to ICAC. ICAC and those affiliated with it express through this protocol their commitment to eradicating violence against women in the areas of work and research. As such, conduct of this type will neither be tolerated nor considered justified under any circumstances in any activity promoted or co-organised by ICAC.

To achieve this goal, the Catalan Institute of Classical Archaeology asks that each and every person in the organisation, and especially those holding leadership positions and exercising authority over others, commit:

- a) To do everything possible to prevent behaviours and attitudes that constitute sexual harassment or harassment based on sex, gender identity and/or sexual orientation.
- b) To act in an appropriate and supportive manner when faced with this type of conduct in accordance with the guidelines set out in this protocol, to expose the existence of these types of behaviours, to reject them and help to prevent them from recurring or worsening, to support affected individuals, and to bring the conduct to the attention of the appropriate people and request their assistance.

ICAC recognises and promotes the participation of personnel (research, services, administration and research support) and students in prevention and awareness-raising actions and activities envisaged in this protocol using the mechanisms for this purpose whenever work, research and service needs allow.

### **3.2. Objectives**

The main objective of this protocol is to prevent any conduct involving workplace sexual harassment at ICAC, among the members of the institute's academic and working community, and resulting from interpersonal relationships within the institute, to act to eradicate and punish this conduct, and to protect and support those whose rights have been violated.

This purpose is detailed in the following specific objectives:

- a) To prevent sexual harassment behaviours, repair damage and punish perpetrators.
- b) To inform, train and raise awareness of ICAC staff about gender equality, sexual harassment, and harassment based on sex, gender identity and/or sexual orientation.
- c) To provide guidelines to identify situations of harassment and other sexist conduct.
- d) To create and implement a flexible procedure for action and support to address and resolve any situations identified.

The following measures and safeguards will be implemented to meet the aforementioned objectives:

- a) Safeguarding the safety, integrity and dignity of the affected people.
- b) Safeguarding the confidentiality of the affected people.

- c) Applying precautionary measures, where necessary and suited to each specific case, to protect the affected people.
- d) Proposing and applying suitable disciplinary measures.
- e) Applying the measures set out in the chapter on preventive measures.

## **4. Scope of application**

The protocol is applicable to all situations arising from any activity that takes place in the workplace or in relation to professional, training or research activities promoted, organised or co-organised by the Catalan Institute of Classical Archaeology, with the clarifications set out in the following points.

### **4.1. Personal scope of application**

This protocol will be applicable for reporting, investigating and proposing disciplinary measures in the event of harassment based on sex, gender identity and/or sexual orientation occurring in the working environment of the Catalan Institute of Classical Archaeology, regardless of its connection to ICAC, and specifically to:

- a. Research staff, associate research staff and visiting research staff.
- b. Research support staff.
- c. Visiting teaching staff.
- d. Students in official courses and other courses organised or co-organised by ICAC, including students in mobility programmes from other institutions.
- e. Work placement staff.
- f. People with no links to ICAC who perform activities or provide services at ICAC and suppliers, entities and companies with a contractual relationship with ICAC.

These individuals may either be the perpetrators or the targets of the types of conduct described in this protocol.

If the situations described in this protocol take place and involve members of the institute but outside their place of work, this protocol will be applied to investigate the facts and propose appropriate preventive measures. In cases of people who do not have an employment relationship with the ICAC, the institutions to which they belong will be informed of the start of the procedure and the file will be transferred to them.

### **4.2. Situational and locational scope of application**

This protocol is applicable in the cases described to any conduct involving sexual harassment or harassment on the grounds of sex, gender identity and/or sexual orientation that take place on ICAC premises. It also applies to activities that take place outside ICAC premises and when ICAC takes part in organisation, coordination or supervision tasks related to research,

academic or work-related activities of any kind, including the following for research staff and students:

- a. Academic activities outside ICAC hours and outside the ICAC premises
- b. Archaeological campaigns and field work
- c. Congresses, conferences and scientific meetings
- d. Curricular and extracurricular work placement done by students but arranged or supervised by ICAC
- e. Activities involving the dissemination or communication scientific knowledge
- f. Other informal activities organised by ICAC staff (dinners, free-time activities, teambuilding and similar activities, etc.)

### **4.3. Temporal scope of application**

The protocol is applicable to any person with a temporary, permanent or merely transitory relationship with ICAC. It is also applicable to situations that take place after the termination of the relationship of any individual involved with the institute within the periods stipulated to this effect in applicable general legislation.

### **4.4. Special interest and at-risk groups**

Harassment of the types set out in this protocol can occur in any profession, work environment or professional category, and in any age group. However, some groups are more vulnerable and need special protection:

- 1) Women with family responsibilities (single mothers, widows, separated and divorced women)
- 2) Survivors of violence against women
- 3) Women with indefinite or temporary contracts and subcontracted women
- 4) The LGTBI+ collective<sup>1</sup>
- 5) People with disabilities
- 6) People who are third country nationals (economic, political or other types of migration)
- 7) Racialised people

## **5. Identifying situations and defining behaviours**

### **5.1. Defining behaviours**

#### **5.1.1. Workplace sexual harassment**

According to Article 7.1 of Organic Law 3/2007 of 22 March on effective equality between women and men:

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<sup>1</sup>An acronym for lesbian, gay, bisexual, transgender, transsexual, intersex and more

Without prejudice to the provisions of the Penal Code, for the intents and purposes of this Act sexual harassment is any form of verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, degrading, or offensive environment.

Harassment can begin in the workplace and continue outside it. A single act, due to its possibly criminal and highly offensive nature, can constitute a case of harassment.

By way of example, and without exclusion or limitation, the following behaviours may be considered evidence of sexual harassment:

- Spreading rumours, asking about or providing details of a person's sex life and sexual preferences without his or her authorisation.
- Making obscene sexual comments or jokes with the intent of offending an individual or group.
- Making rude comments about a person's body or physical appearance with the intent of offending privately or publicly.
- Offering or pressuring to set up dates or engaging in unwanted flirtation.
- Making demands for sexual favours from a person.
- Looking lewdly at a person's body.
- Making obscene gestures in front of a person with the intent of being noticed.
- Using sexually explicit graphics, cartoons, drawings, photographs, or internet images in communications with an individual or group.
- Sending letters, notes or email messages that are sexually offensive or of a sexual nature.
- Making excessive and unwanted physical advances.
- Cornering or deliberately seeking to be alone with a person without just cause.
- Making deliberate, unsolicited physical contact with a person (unwanted pinching, touching, massaging).
- Forcing the harassed person to choose between submitting to sexual requests or losing certain benefits or working conditions (sexual blackmail, *quid pro quo*).
- Creating an intimidating, hostile or offensive environment by means of insistent or repeated comments, jokes, etc. of a sexual nature (environmental harassment).

### **5.1.2. Harassment based on sex**

According to Article 7.2 of Organic Law 3/2007 of 22 March on effective equality between women and men: 'Harassment on the grounds of sex is any behaviour prompted by a person's sex with the purpose or effect of violating his or her dignity, creating an intimidating, degrading or offensive environment.'

By way of example, and with no pretence of exhaustivity, the following behaviours may be considered evidence of harassing behaviour based on sex:

- Any less favourable treatment relating to pregnancy, maternity, paternity and behaviours that may affect the exercise of the right to balance personal, family and work life.

- Ridiculing or belittling a person's abilities, skills or intellectual capacity on the basis of sex.
- Ignoring contributions, comments or actions based on the sex of the person from whom they originated.
- Taking a condescending or paternalistic attitude towards women.
- Refusing to obey orders or follow instructions from hierarchical superiors who are women.
- Assigning positions of responsibility or functions below a person's capabilities on the basis of sex.
- Making sexual advances or humiliating, degrading or obscene comments of a sexist nature in private or public.
- Sabotaging a person's work or preventing access to appropriate resources on the basis of sex.
- Giving orders meant to harass on the basis of sex.
- Making calls, sending messages, emails or contacting a person by any other means on the basis of sex.
- Posting comments, photographs or other materials on social networking sites that are of a sexual nature directed at or about the person being inappropriately targeted.
- Threatening individuals, including the affected person and third parties, who take action to address situations of sexual harassment or aggression with retaliation or reprisals.
- Forcing sexual relations under pressure, coercion, intimidation or chemical submission (conduct punishable as sexual abuse or assault).

### **5.1.3. Harassment based on gender identity and/or sexual orientation**

The definition of harassment based on sexual orientation and/or gender identity is set out in Article 4.g of Law 11/2014 for the purpose of safeguarding LGBTI rights and eradicating homophobia, biphobia and transphobia:

Harassment on the grounds of sexual orientation, gender identity or gender expression: any form of behaviour that is based on a person's sexual orientation, gender identity or gender expression and has the purpose or effect of violating their dignity, threatening their physical or psychological integrity, or creating an intimidating, hostile, degrading, humiliating, offensive or disturbing environment for them.

If a behaviour is viewed in isolation, it may or may not be relevant; however, it is relevant when it is reproduced systematically and results in a series of offending behaviours.

The following behaviours are some examples of what may be considered evidence of harassment based on gender identity and/or sexual orientation:

- Making comments or insults of based on a person's gender identity and/or sexual orientation.
- Using offensive forms of address.

- Ridiculing or belittling a person's abilities, skills or intellectual capacities on the basis of gender identity and/or sexual orientation.
- Ignoring the contributions, comments or actions of a person because of their gender identity and/or sexual orientation.
- Making public or private comments intended to belittle, discredit or humiliate a person.
- Impersonating or using the identity of a person in digital environments with the aim of publicly humiliating the person.
- Invading the privacy of the targeted individual for the purpose of making him or her uncomfortable or using the information obtained publicly.
- Deliberately publishing or disseminating personal or confidential information of the individual who is the object of the conduct with the aim of mocking the person or affecting the person's public image.
- Publicly discrediting the abilities, skills or any other personal characteristic of the individual who is the object of the conduct.
- Deliberately isolating an individual from his or her social environment or preventing his or her inclusion from collective or common activities.
- Engaging in discriminatory behaviour on the basis of sexual identity or orientation.

## 5.2. Types of harassment and subjects

Harassment takes different forms depending the direction of the interactions between the harasser and the harassed, and the organisational levels involved. All types of harassment often create an intimidating, humiliating, or otherwise unfavourable and hostile environment for the person being harassed. The primary consequences are reduced performance, absenteeism and psychological pressure, potentially leading to abuse of authority and coercion regarding possible career advancement or professional improvement.

The following types of harassment can occur, depending on the **direction of the interactions** between the harasser and the person being harassed, and the organisational levels involved:

- a) Top-down harassment: pressure applied by a person with is hierarchically superior to one or more workers.
- b) Bottom-up harassment: pressure applied by an employee or a group of employees to a person with hierarchical superiority.
- c) Horizontal harassment: pressure applied by an employee or a group of employees to one of their colleagues.

The following are some possible types of **sexual and gender-based harassment**:

- a) *Quid pro quo* harassment and sexual blackmail: the harassed person is forced to choose between submitting to sexual requests or losing certain benefits or working conditions. Rejection of the sexual advance is used to deny access to training, employment, promotion, salary increase or any other decision related to the individual's job. This implies an abuse of authority by an individual who is hierarchically superior to a subordinate individual in the employment relationship.



- b) Environmental harassment: conduct that creates an intimidating, hostile, humiliating, or offensive work environment, with comments of a sexual nature, jokes, etc. (usually requiring insistence and repeated incidents, depending on the severity of the behaviour) in relation to the person being harassed.

The following are some possible types of **harassment based on sexual identity** and/or **sexual orientation**:

- a) Direct discrimination: a situation in which a person is, has been or may be treated less favourably than another person in a similar situation because of their sexual identity and/or orientation.
- b) Indirect discrimination: a situation in which a provision, criterion, interpretation or practice that is presumably neutral may give lesbian, gay, bisexual, transgender or intersex (LGBTI+) people a particular disadvantage compared to non-LGBTI+ people.
- c) Discrimination by association: a situation in which a person is the object of discrimination based on their sexual identity and/or orientation as a result of their relationship with an LGBTI+ person or group.

Sexual harassment and harassment based on sex, sexual orientation and/or sexual identity are considered harassment if they occur in the workplace during working hours, as well as when they occur outside the workplace and/or during non-working hours if they are work-related.

Likewise, sexual harassment, harassment based on sex, sexual orientation and/or sexual identity may involve ICAC employees as well as external parties, such as suppliers or collaborating companies.

### 5.3. Identifying elements

- A. Behaviour that the person being harassed views as unwanted

When harassment occurs, the person being harassed is the object of unwanted conduct. 'Unwanted behaviour' and 'unwanted conduct' are considered to be behaviours the person does not seek and, especially, behaviours that the person does not want.

- B. Behaviour with sexual connotations or connotations of a sexual or sexist nature

This type of conduct can be verbal, non-verbal or physical and can take many forms, from apparently harmless actions such as jokes or comments on a person's physical appearance, to actions that may be considered serious or even a criminal offense such as forcing a person to have sexual relations.

- C. Behaviour that violates a person's dignity or creates an intimidating, hostile, offensive, degrading or humiliating environment

This is generally considered to take place when a behaviour is persistent. However, if serious enough, a single isolated incident of this type can be considered harassment.

- D. Other clarifications

The behaviours described can involve people at the same hierarchical status, or may originate with superiors and be directed at hierarchical inferiors or may originate with inferiors and be

directed at hierarchical superiors. The harasser and the harassed person do not necessarily have to have a relationship of physical, psychological or hierarchical power for the harassing conduct to take place.

The conducts described do not need to be repeated or be continuous. The specific details of each case must be evaluated in accordance with guidelines set out in the following section of this protocol.

The behaviours may take place between individuals or be applied by a group or set of individuals against an individual, or can take the form of environmental harassment in which no individual perpetrator stands out, but the result is nonetheless hostile or intimidating for the affected person.

#### **5.4. Accumulation or intersection of situations**

In the event of a combination of situations in which the same person is the object of harassing conduct arising from more than one of the aforementioned factors or combined with situations not covered by this protocol, that person will receive special protection and assistance in all areas involved, given the greater need for protection that the person (or people) affected by the situation reported may require.

#### **5.5. Description of other sexist behaviours**

People who are subjected to sexist behaviours other than harassment, in other words, behaviours related to sex, gender, gender identity and/or sexual orientation, will receive special protection and assistance to reach a solution in accordance with ICAC's policy to prevent discrimination based on gender, sex, gender identity and/or sexual orientation. Tolerance of these types of sexist behaviours will harm the working environment and may even damage ICAC's public image.

By way of example, and with no pretence at exhaustivity, the following behaviours may be considered as evidence of sexist behaviours:

- a. Use of sexist language
- b. Use of sexist humour
- c. Making public verbal or written comments of a sexist, homophobic or transgender-related nature that are not directed at a specific person. Public comments are understood to be comments that are made in the context of the workplace, in archaeological activities, meetings, classes, practice sessions, seminars, conferences, public defence of theses, tribunals, commissions, teaching materials, digital platforms and other digital media aimed at the community or a specific group (of any size), as well as in working groups, committees and governing and participatory bodies of ICAC.
- d. Publishing images for dissemination among the ICAC community of a sexist, homophobic or transgender-related nature that are not directed at a specific person in accordance with the conditions set out in the previous section.
- e. Preventing the expression of opinions that may expose sexist behaviour of any kind, whether they be complaints or the organisation of activities, conferences, symposia or other events.

- f. Engaging in any of the conducts described above in the context of scientific, work or training activities organised or co-organised by ICAC.
- g. Recommending literature that is sexist, male chauvinist, homophobic or disrespectful of the rights of transgender people, unless it is done for research or critical purposes.
- h. Demanding uniforms or specific clothing not required for the type of activities in professional, work or academic activities.
- i. Demanding the performance of activities of a sexist nature that personnel have the right to refuse.

## 6. PROCEDURES FOR TAKING ACTION

### 6.1. Procedural guarantee and principles

Due to the nature of the personal situations and the people involved that must be addressed in situations of harassment, the principles governing the actions laid out in this protocol are the following:

- 1) Principle of respect of personal dignity
- 2) Principle of non-discrimination on the grounds of race, sex, religion, language, opinion, place of birth or residence, or any other personal or social condition or circumstance
- 3) Principle of equity
- 4) Principle of confidentiality
- 5) Principles of efficiency, coordination and participation
- 6) Principle of urgency
- 7) Principles of the disciplinary regime, included in article 94 of the EBEP (legality, typicality, non-retroactivity of the sanctioning provisions unfavorable and retroactivity of those favorable to the presumed infringer, *non bis in idem*, proportionality, guilt, presumption of innocence).

In addition, the following criteria will be applied:

- Prior to starting the intervention phases set out in Point 6.3.2 of this protocol, any person linked to ICAC who suspects that he or she is the object of harassment or any other person who has knowledge of a possible case of harassment may contact the Equality Committee, the director of the institute or the employee representatives to receive any advice that may be needed.
- People affected by behaviour that may constitute harassment as set out in this protocol can file a complaint, and they have the right to receive a response. The institute is obliged to record the complaint in writing, even when the facts have been reported verbally, as well as all the steps taken during the process.
- The procedure must safeguard the right to indemnity. Any adverse treatment or negative impact on the person filing the harassment complaint or report is prohibited.

### 6.2. Definition and competencies of acting agents

### 6.2.1. Referral people

They are the people responsible for informing, advising and guiding the affected person throughout the whole process. At ICAC these are:

- A person designated by the director of the institute
- A person designated by the workers' representatives
- A person designated by the Equality Committee

These people should be trained in equality issues and have the respect and trust of ICAC and its staff so that they can carry out their duties on behalf of all the members of the organisation. The people chosen will not hold the position permanently. They will be selected for each possible case of sexual harassment, or harassment based on sex or gender identity and/or sexual orientation.

The functions of the referral people will be:

- To inform and advise the affected person of their rights and of the content of the protocol and their options, as well as current legal, financial and health resources, and actions they can take.
- To offer guidance to the affected person throughout the entire process.
- To assist in drafting the complaint and provide advice on how to submit it if the affected person requests assistance in this regard.
- To propose to the director of the institute the adoption of precautionary and/or preventive measures as appropriate in keeping with the gravity of the situation. In this case, legal advice must be sought to ensure no unlawful acts are committed.
- To manage and safeguard any documentation in the communication and counselling phase, ensuring the confidentiality of all documents and information generated in this phase.
- To prepare the preliminary report that establishes possible continuation of the procedures contained in this protocol.

In order to ensure the process is carried out expeditiously and to maintain the working conditions of the referral people, the workload of referral people will be reduced for the duration of the procedure.

### 6.2.2. Inquiry Committee

The Inquiry Committee will thoroughly study complaints of harassment at the institute, issue a binding report indicating whether a situation of harassment exists or does not exist, and make any recommendations necessary on the interventions and measures required.

The committee will be made up of:

- A person designated by the director of the institute
- A person designated by the workers' representatives
- A person designated by the Equality Committee

The Inquiry Committee will receive all necessary legal assistance at all times. Members of the Inquiry Committee may also request the assistance of an expert on gender equality and sexual harassment. To these ends, links with CERCA, the Bar Association of Tarragona, the URV Equality Observatory and other specialised services will be fostered.

An *ad hoc* Inquiry Committee will be formed for each possible case of sexual harassment, or harassment based on sex or sexual orientation.

The Inquiry Committee will make decisions collegially. People in the committee should have training in gender equality and sexual harassment.

The Inquiry Committee will receive a report and other documents for the case file from the referral people.

The functions of the committee will be as follows:

- To investigate possible situations of sexual harassment or harassment based on sex or gender identity and/or sexual orientation at the institute. In the investigation procedure, the complaint and supporting documentation submitted will be analysed and those involved and possible witnesses will be interviewed. All parties interviewed will be informed of the need for confidentiality throughout the process.
- To issue a binding report on the situations described in the previous section on the existence or inexistence of a situation of harassment. The report must contain at least the following information:
  - The identities of the people involved
  - A list of all people who have taken part in the inquiry and in preparing the report
  - Background information
  - Other actions taken and evidence provided
- To assess the existence of aggravating circumstances such as:
  - If the accused party is a repeat offender.
  - If there have been threats, intimidation or retaliation on the part of the harassing person.
  - The rank or position of the harassing person and hierarchical relationship the harassed person.
  - If the harassed person has any type of accredited medical disability or physical or psychological problem.
  - If the harassed person has been pressured by family members or witnesses with the aim of hindering or preventing the inquiry.
- To issue the final conclusions of the investigation.
- To make any recommendations which may be appropriate on interventions and measures needed.
- To propose adoption of precautionary and/or preventive measures to the director of the institute.
- To maintain custody of any documentation generated during the inquiry phase.

In order to ensure the process is carried out expeditiously and to maintain the working conditions of members of the Inquiry Committee, the workload of those involved will be reduced for the duration of the procedure.

### **6.2.3. Board of Directors**

The institute's highest decision-making and administrative body is the Board of Directors. Its functions are as follows:

- To keep up to date on procedures that are in progress or resolved
- To endorse any disciplinary measures that may result from the application of the protocol

### **6.2.4. Director of the institute**

ICAC's chief executive officer oversees execution of resolutions of the Board of Directors.

The director's functions are as follows:

- To inform the Board of Directors as promptly as possible of any situations of sexual harassment or harassment based on sex or gender identity and/or sexual orientation that he or she has become aware of at the institute
- To apply precautionary measures proposed by reference personnel
- To apply the preventive and corrective measures proposed by the Inquiry Committee
- To initiate, where appropriate, the procedure for disciplinary measures after consulting the Board of Directors

The functions described in this section will not apply if the director is involved in the possible situation of sexual harassment. In this case, the protocol will be adapted to the specific situation, the director will not be involved in the application of the procedure, and the Board of Directors or the body designated by it will carry out the functions described in this section.

### **6.2.5. Equality Committee**

The Equality Committee will act with complete independence, impartiality, and objectivity of judgement. It is comprised of three people who can be changed every three years. Its functions are as follows:

- To take part in creating and promoting policies to prevent situations of sexual harassment
- To support the Inquiry Committee, whenever requested to do so
- To support the parties involved in the different phases of the procedure set out in this protocol whenever necessary
- To implement the protocol awareness-raising and training actions set out in Point 7 of this document
- To proactively draw attention to and denounce sexist behaviour

### **6.2.6. Ethics Committee**

The Ethics Committee will act with complete independence, impartiality and objectivity of judgement. It is comprised of three people who can be changed every three years. Its functions are as follows:

- To support the Inquiry Committee, whenever requested to do so
- To provide guidance on any ICAC internal or external awareness or communication measures that may be adopted by the Board of Directors

### **6.2.7. Employee delegates and representatives**

Staff delegates or the workers' committee will represent workers at the institute, depending on the number of workers. These people are selected in union elections held every four years. Their functions are as follows:

- To report any possible situations of sexual harassment or harassment based on sex or gender identity and/or sexual orientation they may become aware of at the institute.
- To provide guidance and support in the procedure to affected people whenever requested. The affected person will be informed of the possibility of receiving guidance by a workers' representative.
- To support the Inquiry Committee, whenever requested to do so.
- To pair the affected person with a referral person in the union with the expertise to provide guidance on procedures and on the rights of the affected person beyond activating the protocol.

### **6.2.8. Institute staff**

Institute staff is considered to be the personnel defined in Section 4.1. Their functions are as follows:

- To report any possible situations of sexual harassment or harassment based on sex or gender identity and/or sexual orientation that they may become aware of
- To assist in procedures by providing any information they may have related to the events under investigation
- To take part in annual information, awareness-raising and training sessions and other activities outlined in Point 7

## **6.3. Phases of the procedure**

The procedure may be initiated via an internal communication or directly via an external complaint through administrative (labour inspection) or judicial (social court) channels. A diagram outlining the series of steps and actions established by the protocol can be found in Annex 3 of this document.

The external channel may be especially appropriate when internal channels of resolution seem inadequate because of the seriousness or nature of the facts or the position of the person who has given rise to the situation, or if there is disagreement regarding the solution reached internally. In any case, whenever the facts are likely to constitute a crime (sexual harassment is defined as a crime in Article 184 of the penal code), criminal proceedings must be initiated.

Application of this protocol will be not suspended due to initiation of external proceedings.

Referral people have the capacity to handle the actions that comprise this stage.

### 6.3.1. Preliminary advising

Prior to starting the intervention phases set out in Point 6.3.2 of this protocol, any person linked to ICAC who suspects that he or she is the object of harassment or any other person who has knowledge of a possible case of harassment may contact the Equality Committee, the director of the institute or the employee representatives to seek any advice that may be needed.

The aforementioned bodies and the referral people designated by them must act in accordance with the following criteria on counselling and guidance provided to the affected person:

- Apply an approach of attentive and proactive listening.
- Provide information in a clear and comprehensible manner.
- Inform the affected person of the services and resources available.
- Provide personalised guidance based on an assessment of the needs and expectations of the affected person.
- Do not reinterpret facts or create false expectations.
- Do not adopt paternalistic attitudes.
- Do not make value judgments regarding the actions of the affected person.
- Do not re-victimise the affected person.

The diversity and cultural situation of the affected person should be taken into account in addition to the details of the harassment.

This phase is not mandatory, but will be applied whenever the affected person or any other party with knowledge of alleged harassment requires the guidance of a referral person.

### 6.3.2. Reporting situations of harassment and initiating the procedure

The objective of this phase is to inform, advise and guide the person being harassed and to prepare for the internal complaint and investigation phase, if applicable.

This phase **may not have a duration exceeding three working days**, starting with notification of perception or suspicion of harassment which sets reporting and counselling actions in motion.

Who can make a report?

- The affected person<sup>2</sup>
- Any person who notices harassing behaviour

How can the report be submitted?

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<sup>2</sup>An 'affected person' or person affected by sexual harassment is any person who is the target of conduct or actions falling within the types of sexual harassment set out in this protocol that take place within the scope of the institute's employment relations.



- It can be submitted in writing, using a specific form designed for this purpose, by email or verbally by means of a conversation.

To whom should it be addressed?

- To the Equality Committee, to the director of the institute, or to employee representatives. Regardless of which of the three agents receives the report, that body or person will immediately inform the other two agents, and the director of the institute will call an election of referral people as quickly as possible.

In this phase, the referral people will:

- Attend to the request following the protocol established for this purpose.
- Collect the necessary documentation and information on the events under investigation.
- Perform any actions deemed necessary to investigate the scope of the acts.
- Contact public psychological or health care services if warranted by the seriousness of the case or at the request of the affected person.
- Refer the affected person, if necessary, to a legal consultancy for guidance through union representatives, the Tarragona Bar Association or any other entity with a relationship with ICAC.
- Propose the adoption of any precautionary and/or preventive measures deemed appropriate to the director of the institute.
- Perform an **initial assessment** and issue a report, which must include the following points:
  - A. Lack of evidence sexual harassment or harassment based on sex or gender identity and/or sexual orientation. A report justifying the conclusions must be issued, addressed to the director of the institute, who will decide if the process will be terminated and inform the parties involved.
  - B. Evidence of sexual harassment or harassment based on sex or gender identity and/or sexual orientation. The director of the institute must be notified of the decision. The director will then inform the Board of Directors and parties involved of the conclusion.

### 6.3.3. Internal complaint and investigation

The objective of this phase is to thoroughly investigate the facts in order to issue a binding report indicating the existence or lack of evidence of a situation of harassment and to propose measures to address the situation. An Inquiry Committee will be convened for this purpose comprised of the people indicated in Point 6.2.

The investigation will be initiated on the basis of the complaint made by the affected person. The person making the complaint must only provide evidence substantiating the situation of harassment. The alleged harasser must prove absence of harassment in accordance with the procedural principle of reversal of the burden of proof.

In accordance with the provisions of regulations on administrative procedure, as well as to ensure the principle of confidentiality, the complaint will be submitted in writing in a sealed envelope addressed to the director of ICAC to the ICAC general registry.

When the complaint is made *ex officio*, the director of ICAC will refer it to the Inquiry Committee so that the committee may initiate the procedure. Likewise, when a complaint is received from a person who claims to be the object of sexual harassment but declines to initiate the protocol, the director of ICAC will initiate the procedure *ex officio* in order to clarify whether there are indications of a possible situation of harassment.

In both cases, the request by the affected person must be attended to in **a maximum of three working days from receipt of the request.**

#### **6.3.4. Inquiry Committee**

The committee will be convened when the protocol is initiated *ex officio*, or when the report issued by the referral people determines that a possible situation of sexual harassment or harassment on the grounds of sex or gender identity and/or sexual orientation exists.

Once the Inquiry Committee has received the written request to initiate proceedings and any supporting documentation, it will undertake the pertinent investigation to determine whether or not harassment has taken place.

The Inquiry Committee will issue a binding report stating whether a situation of harassment exists or does not exist and make any recommendations necessary on the interventions and measures required.

The report will include at least the following information:

- The identities the person or people allegedly harassed and the person or people accused of harassment.
- A list of all people who have taken part in the inquiry and in preparing the report.
- Background of the case, complaint and circumstances.
- Other actions: evidence, summary of main facts and actions taken. When witnesses are interviewed, in order to ensure confidentiality, the summary of the interview should not indicate who made each statement, but only whether or not the events under investigation have been substantiated.
- Aggravating circumstances are considered to be:
  - If the accused party is a repeat offender of acts of harassment.
  - If two or more people were harassed.
  - If there is evidence of intimidating or retaliatory behaviour by the harassing person.
  - If the harassing person has decision-making power in the employment relationship with the harassed person.
  - If the harassed person has any type of disability.
  - If the physical or psychological state of the person harassed is accredited by medical personnel as having been seriously affected.
  - If pressure or coercion is applied on the person harassed, witnesses or other people in their work or family environment with the aim of preventing or hindering the investigation.
- Conclusions.

- Corrective measures.

The Inquiry Committee's report will be sent to the director of the institute.

### 6.3.5. Precautionary measures

Any precautionary measures deemed appropriate in accordance with the seriousness of the case and the direct impact on the harassed person may be applied during the proceedings of Inquiry Committee.

These measures will be approved by the director of the institute and duly reported to the Board of Directors.

### 6.3.6. Resolution

The director of the institute will issue a resolution, which will be endorsed by the Board of Directors, based on the binding report issued by the Inquiry Committee.

This resolution will be issued **no later than 20 working days after the initiation of the procedure, which may be extended to 30 working days.**

- If there is sufficient evidence to prove that a situation of harassment has taken place:
  - Disciplinary proceedings for a proven situation of harassment will be initiated.
  - Corrective measures will be adopted.
- If there is insufficient evidence to prove a situation of harassment has taken place:
  - The complaint will be dismissed.

The decision will include details identifying the complainant and the person who is the object of the complaint, the cause of the complaint and the facts of the case.

A copy of the decision will be sent to those concerned.

If the investigation reveals that other non-harassment types of misconduct described in applicable law or agreements (for example, false allegations) have occurred, appropriate disciplinary proceedings will be initiated.

Likewise, regardless of whether the complaint results in disciplinary measures or not, a review of the working situation of the person who filed the complaint will be conducted.

### 6.3.7. Disciplinary measures

If the Inquiry Committee's report establishes the existence of a situation of sexual harassment or harassment on the grounds of sex or gender identity and/or sexual orientation, in addition to any measures proposed in its report, disciplinary proceedings will be initiated to determine the possible liability of the respondent or respondents.

In accordance with Article 95.2.b of Royal Legislative Decree 5/2015 of 30 October, Consolidated Text of the Law on the Basic Statute of Public Employees (TREBEP), any action that involves discrimination on grounds of sexual orientation or sex or harassment on the grounds of sexual orientation, sexual harassment or on the grounds of sex, etc. constitutes a very serious offence. Similarly, Article 54.2.g of Royal Legislative Decree 2/2015 of 23 October, Revised Text of the Workers' Statute Law, classifies harassment on the grounds of

sexual orientation, sexual harassment, and harassment on the grounds of sex as a breach of contract subject to termination of the employment contract by means of disciplinary dismissal.

In accordance with the provisions of Article 96.1.a and 96.1.b of TREBEP, very serious misconduct may give rise to disciplinary dismissal. Organic Law 10/1995 of 23 November of the Penal Code establishes the following in Articles 184 and 173.1:

#### Article 184.

1. Whoever solicits favours of a sexual nature, for himself or for a third party, within the setting of a continuous or usual work relation, teaching or service provision relation, and by such conduct causes the victim a situation that is objective and seriously intimidating, hostile or humiliating, shall be convicted of sexual harassment and punished with a sentence of imprisonment of three to five months or a fine from six to ten months.
2. Should the party guilty of sexual harassment have committed the act availing himself of a situation of labour, teaching or hierarchical superiority, or specifically or tacitly warning of harm to the victim in relation to the lawful expectations that person may have within the setting of that relation, the punishment shall be five to seven months' imprisonment or a fine of ten to fourteen months.
3. When the victim is especially vulnerable, due to age, illness or the circumstances, the punishment shall be five to seven months' imprisonment or a fine of ten to fourteen months in the cases foreseen in Section 1, and of imprisonment for six months to one year in the cases foreseen in Section 2 of this Article.

#### Article 173.

1. Whoever perpetrates acts against the sexual indemnity of a child under the age of sixteen years shall be convicted of sexual abuse of the child, with a sentence of imprisonment from two to six years.

The same penalty will apply to those who, in the context of any employment or civil service relationship, take advantage of their relationship of superiority to repeatedly perpetrate hostile or humiliating acts against another person which, without constituting degrading treatment, amount to the severe harassment of the victim.

If the investigation reveals that the person or people making the complaint have made a false allegation, appropriate disciplinary measures will be taken.

If the study of medical criteria from the health surveillance doctors determines that the harassment has resulted in damage to the victim's physical or psychological health, this will be considered an occupational accident for the purposes of applicable Social Security regulations. The affected person will be referred to the mutual insurance company for occupational accidents and diseases for examination and documentation.

#### **6.3.8. Proposed follow-up and monitoring measures**

The director of the institute will be responsible for monitoring the implementation of the proposed measures.

The director of the institute will propose such measures as he or she deems appropriate to ensure the health of the affected person, to restore rights that have been violated, and to restore balance to the affected working environment.

ICAC's Equality Committee may take part in monitoring the measures adopted and propose awareness-raising and training activities, for example, based on the situations that led to the activation of the protocol.

The Equality Committee will ensure that deadlines established in the protocol are met and that the procedure is completed correctly. It will bring any potential violations to the attention of the Board of Directors.

## **7. PREVENTION MEASURES**

Through its Equality Committee, the Catalan Institute of Classical Archaeology will design and apply the necessary strategies to raise awareness and provide information and training to prevent sexual harassment and harassment based on sex, gender identity and/or sexual orientation.

### **7.1 Raising awareness of the protocol**

The measures proposed to raise awareness of the protocol are as follows:

- a) ICAC and associate staff, as well as staff affiliated with the institution, must be informed of the existence of this protocol and made aware of its content.
- b) Informative materials to identify possible risks and raise awareness of appropriate preventive measures will be provided. Appropriate actions must be taken to ensure these reach all ICAC personnel.
- c) This protocol will be published on the general websites of ICAC and the Equality Committee to ensure it reaches its intended audience and to guarantee easy access.
- d) The entire ICAC community will be informed of the existence and approval of the protocol by email.
- e) Accompanying awareness-raising guides will be published in Catalan, Spanish and English.
- f) New staff hired by ICAC will sign this protocol to confirm their knowledge and acceptance of its conditions when they are hired.
- g) An awareness-raising session will be arranged each year prior to archaeological activities, as well as one for students (presentation of and where to find content, and what to do in the event of a possible case of harassment).
- h) Each year, all members of the institute will be informed of actions to be taken within the framework of the protocol, safeguarding personal data at all times.
- i) Each year, all ICAC staff will be notified of the members of Equality Committee, the employee representatives and ICAC's director.

Furthermore, collaborating companies, service providers, companies and entities where students are doing work placement, and institutions to which ICAC personnel are affiliated

and/or assigned, will be informed of the protocol and its content, and of strict obligation of compliance with the protocol.

## 7.2. Awareness-raising actions

The measures proposed to raise awareness of the protocol are as follows:

- a) Annual awareness-raising campaigns on zero tolerance of harassment to coincide with International Day for the Elimination of Violence against Women on 25 November.
- b) The promotion of activities such as essay competitions on the subject of archaeology and violence, conferences on sexual or gender microaggressions, taking advantage of ICAC's participation in international days and weeks such as International Day of Women and Girls in Science on 11 February, and International Working Women's Day on 8 March.
- c) Audio-visual materials selected on a regular basis to raise awareness on gender issues disseminated via the institute's newsletter, social networks and the ICAC and Equality Committee websites.
- d) The creation of positive communication campaigns on possible cases of sexual harassment at ICAC, as studies demonstrate that when an institution stands by a victim and manages the situation with transparency and proactivity rather than trying to minimise the issue, the negative reaction of the public is reduced to almost the same level as an entity that has not had any complaints.<sup>3</sup>
- e) The implementation of equality and organisational policies that make sexual harassment and harassment based on sex or gender identity and/or sexual orientation more difficult.
- f) The promotion of participative management and leadership styles to foster group cohesion and encourage the flow of information among all ICAC staff.
- g) The approval and implementation of this protocol to address any possible reports and complaints effectively.
- h) Oversight, monitoring and evaluation of the implementation of the procedure.

## 7.3 Education

The training measures proposed are as follows:

- a) Providing relevant training and information on preventing and identifying harassing behaviours to management staff with different key objectives, among them promoting good leadership and a positive management style.
- b) Providing relevant training and information on preventing and identifying harassing behaviours to all ICAC staff.

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<sup>3</sup> Gündemir, S.; Does, S.; Shih, M. *Third Party Perceptions of Organizations Facing Sexual Harassment Claims*. Academy of Management Annual Meeting Proceedings 2018(1):12385. Available here: <https://doi.org/10.5465/AMBPP.2018.12385abstract>

## 7.4. Commitment of third parties affiliated with ICAC

In order to ensure that this protocol is respected and applied to activities carried out outside ICAC headquarters or by third parties, all collaboration and subcontracting agreements signed by ICAC with third parties must mention the existence of this protocol and the institution's commitment to adhering to it.

## 8. MEASURES TO PROVIDE SUPPORT AND GUIDANCE TO AFFECTED PEOPLE

ICAC will apply measures to provide support, guidance and protection in accordance with budgetary limitations for any person affected by any of the situations described in this protocol that occur at ICAC, during archaeological campaigns, or in any type of activity organised or co-organised by the institute.

For example, ICAC envisages the possibility of establishing collaborative relationships with public and university resources in Tarragona. Other proposals include:

- a) Signing a collaboration agreement with the Tarragona Bar Association to offer a free legal advice and consultation service to victims.
- b) Signing a collaboration agreement with the URV's Equality Observatory to offer a consultancy service, particularly in psychological and social work services.
- c) Promote dialogue with the URV to invite specialists as needed to offer their expert and specialised critique during the process of activating the protocol.

This protocol also extends to cases of sexual harassment and harassment based on sex, gender identity and/or sexual orientation of people with no connection to ICAC who perform activities or provide services at ICAC and suppliers, entities or companies with a contractual relationship with ICAC. In these cases, ICAC will apply appropriate measures (termination of external internship agreements, requirement to replace staff, etc.).

## 9. MONITORING AND ASSESSMENT OF THE PROTOCOL

### 9.1. Monitoring implementation of the protocol

The director of the institute and the Equality Committee will meet twice a year to evaluate and monitor application of the protocol and to issue a brief report to the Board of Directors.

At each of its ordinary meetings, the ICAC Board of Directors will receive a brief report on the results of the application of the protocol.

### 9.2. Indicators

The following indicators will be included in the Equality Committee's annual report:

- Number of workers who have reported harassment (in the forms included in this protocol) and percentage of the total number of workers.

- Number of workers who have made a harassment complaint (in the forms included in this protocol) and percentage of the total number of workers.
- Number of disciplinary procedures executed during the year at the institute.
- Number of protocol information, awareness-raising and training actions.

As a CERCA centre, these indicators must be included in ICAC's evaluation reports and during the European Commission Human Resources Strategy for Researchers (HRS4R) accreditation renewal processes.

### 9.3. Review of the protocol

This protocol will be reviewed and modified whenever its use or legal or juridical imperatives make it necessary. The protocol will also be reviewed at least every four years to determine whether it needs amending or not.

Changes to the names of the different bodies and people in this protocol will not necessarily require the protocol to be updated because the names will always be understood as referring to those same bodies and people assigned to the same competences, regardless of their names.

## 10. ANNEXES

### Annex 1. Regulatory framework

#### International and community legislation

C111 Discrimination (Employment and Occupation) Convention, 1958. Recommendation (no. 111 on discrimination (employment and occupation), 1958.

Declaration on the Elimination of Violence against Women, United Nations General Assembly Resolution 48/104 of 20 December 1993.

The Declaration of the EU Council of 19 December 1991 on the implementation of the Recommendation on the Protection of the Dignity of Women and Men at Work (including the Code of Practice to Combat Sexual Harassment).

Convention on the Elimination of All Forms of Discrimination against Women adopted by the United Nations General Assembly on 18 December 1979, which entered into force as an international treaty on 3 September 1981, and the Optional Protocol, which has been in force since 2001.

Directive 2002/73/EC of the European Parliament and of the Council of 23 September 2002, amending Council Directive 76/207/EEC of 9 February 1976 on the implementation of the principle of equal treatment for men and women as regards access to employment, vocational training and promotion, and working conditions.

Directive 2006/54/EC of the European Parliament and of the Council of 5 July, 2006, on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment (consolidated).

#### State regulations



Spanish Constitution (articles 14, 9.2, 15, 18 and 35)

Organic Law 3/2007 of 22 March on effective equality between women and men (articles 7, 8, 48 and 62)

Law 31/1995 of 8 November on the prevention of occupational hazards (articles 4, 14, 15, 22 and 24)

Organic Law 10/1995 of 23 November of the Penal Code (articles 184 and 173)

Organic Law 3/2018 of 5 December on the protection of personal data and ensuring digital rights

Royal Decree 33/1986 of 10 January, approving regulations on the disciplinary system for civil servants of the state

Royal Decree 171/2004 of 30 January implemented through Article 24 of Law 31/1995 of 8 November on the prevention of occupational risks on coordinating business activities

Law 1720/2007 of 21 December, approving the regulations implementing Organic Law 15/1999 of 13 December on the protection of personal data

Royal Decree 39/1997 of 17 January, approving prevention services regulations

Royal Legislative Decree 1/1995 of 24 March approving the consolidated text of the Workers' Statute Law (articles 4, 17, 54-56, 58, 60, and 93-96)

Royal Legislative Decree 5/2000 of 4 August approving the consolidated text of the law on infringements and penalties relating to labour regulations (Article 8).

Royal Legislative Decree 2/2015 of 23 October approving the consolidated text of the Workers' Statute Law

Royal Legislative Decree 5/2015 of 30 October approving the consolidated text of the Basic Public Employee Statute

Royal Decree Law 6/2019 of 1 March on urgent measures to guarantee equal treatment and opportunities for men and women in employment and occupation

### **Catalan regulations**

Organic Law 6/2006 of 19 July, on the reform of the Statute of Autonomy of Catalonia, (articles 4, 19 and 41)

Law 1/2003 of 19 February on universities of Catalonia (Article 3)

Law 5/2008 of 24 April on the right of women to eradicate gender-based violence (Article 5)

Law 11/2014 of 10 October guaranteeing lesbian, gay, bisexual, transgender and intersex rights to eradicate homophobia, biphobia and transphobia (articles 4 and 21)

Catalan Law 17/2015 of 21 July on effective equality between women and men

### **Other reference regulations**

Technical Criterion 69/2009 on the actions of the Labour and Social Security Inspectorate on harassment and violence in the workplace

NTP 507 of the National Institute for Safety and Health at Work 'Sexual harassment at work'

NTP 891 and 892 of the National Institute for Safety and Health at Work 'Procedure for the autonomous settlement of disputes involving workplace violence (I) and (II)'

2009 Catalan Framework Protocol Common standards or criteria for assisting people in situations of harassment

## **ICAC regulations**

AGREEMENT GOV/159/2015 of 13 October, approving the amendment and full text of the statutes of the Catalan Institute of Classical Archaeology consortium (ICAC)

Available here: <http://www.icac.cat/wp-content/uploads/2015/06/estatuts.pdf>

Action Plan (2015-2018) for the Implementation of Human Resources Policies in accordance with the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers for the Catalan Institute of Classical Archaeology (ICAC)

Available here: [http://www.icac.cat/wp-content/uploads/images/pdf\\_doc/rh/action\\_plan.pdf](http://www.icac.cat/wp-content/uploads/images/pdf_doc/rh/action_plan.pdf)

Catalan Institute of Classical Archaeology Code of Ethics (2017)

Available here: [http://www.icac.cat/wp-content/uploads/2017/04/codi\\_etic\\_icac.pdf](http://www.icac.cat/wp-content/uploads/2017/04/codi_etic_icac.pdf)

CERCA Code of Conduct (2019)

Available here: [http://cerca.cat/wp-content/uploads/2018/11/Codi-de-conducta-CERCA\\_nov2018.pdf](http://cerca.cat/wp-content/uploads/2018/11/Codi-de-conducta-CERCA_nov2018.pdf)

Order UNI/485/2003 of 21 November 2003 approving the affiliation of the Catalan Institute of Classical Archaeology as a research institute with Rovira i Virgili University

Available here: <http://www.icac.cat/wp-content/uploads/2015/06/adscriccio.pdf>

Gender Equality Action Plan version 1.2 (2018)

Available here: [http://www.icac.cat/wp-content/uploads/2017/04/Pla-Igualtat-ICAC\\_v1.2.pdf](http://www.icac.cat/wp-content/uploads/2017/04/Pla-Igualtat-ICAC_v1.2.pdf)

Principles for recruiting ICAC staff (2017)

Available here: [http://www.icac.cat/wp-content/uploads/2017/04/otm-r\\_principles\\_cat.pdf](http://www.icac.cat/wp-content/uploads/2017/04/otm-r_principles_cat.pdf)

## Annex 2. Reference protocols

Protocol for the prevention, detection, action and resolution of situations of sexual harassment and harassment based on sex, gender identity and/or sexual orientation in the administration of the Government of Catalonia (2015)

Available here:

[http://politiquesdigitals.gencat.cat/web/.content/funcio\\_publica/documents/prevencio\\_i\\_salut\\_laboral/assetjament/Protocol\\_assetjament\\_sexual/Protocol-assetjament-sexual.pdf](http://politiquesdigitals.gencat.cat/web/.content/funcio_publica/documents/prevencio_i_salut_laboral/assetjament/Protocol_assetjament_sexual/Protocol-assetjament-sexual.pdf)

The University of Barcelona's protocol for prevention, detection and action against sexual harassment and harassment based on gender, gender identity or sexual orientation, and other sexist behaviour (2019)

Available here:

[https://www.ub.edu/dyn/cms/continguts\\_ca/menu\\_eines/noticies/docs/protocol\\_assetjament.pdf](https://www.ub.edu/dyn/cms/continguts_ca/menu_eines/noticies/docs/protocol_assetjament.pdf)

Protocol for action against sexual harassment (2016)

Available here: <https://www.mmb.cat/wp-content/uploads/2017/06/2017-229-Protocol-assetjament-sexual-vOK-ALTA.pdf>

Protocol for preventing and taking action against violence against women and violence against LGBTBI affecting URV students (2019)

Available here:

[https://www.urv.cat/media/upload/arxiu/igualtat/pdf/Protocol\\_est\\_LGTBI.pdf](https://www.urv.cat/media/upload/arxiu/igualtat/pdf/Protocol_est_LGTBI.pdf)

Protocol against sexual harassment and harassment based on sex (2010)

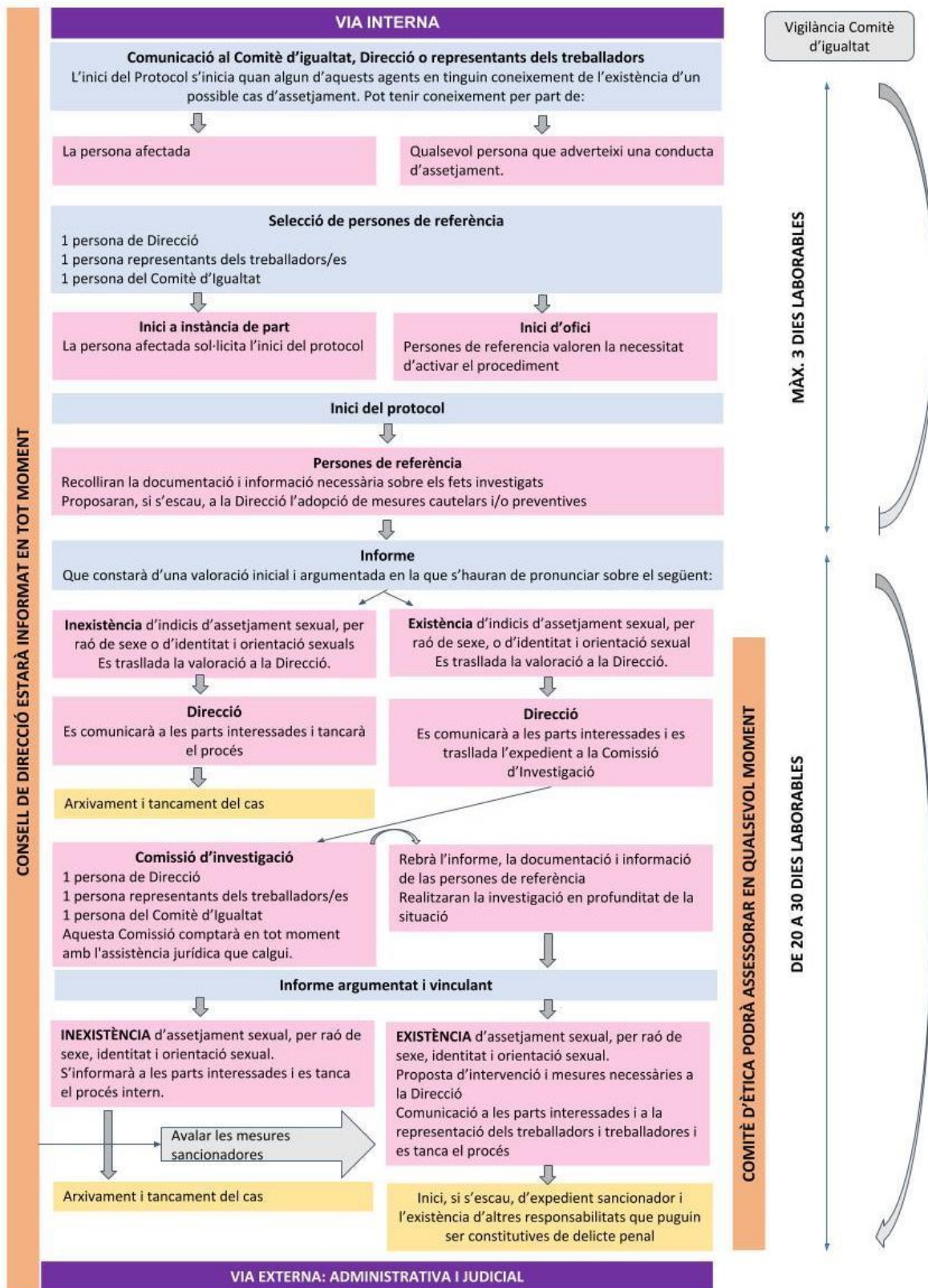
Available here:

<http://www.fundacio.urv.cat/media/upload/arxiu/La%20FURV/Portal%20Transparencia/Personal/Protocol%20contra%20Assetjament%20sexual.pdf>

Arkeo Gazte protocol for preventing and taking action in situations of harassment, abuse and sexual or gender-based harassment (2018)

Available here: <https://www.arkeogazte.org/wp-content/uploads/2019/12/2018-11-26-Protocolo-Arkeogazte-ES.pdf>

### Annex 3. Diagram of the action sequence



#### **Annex 4. Supporting instruments for the protocol**

- A. Request by an affected person for the study of documents in a sealed envelope
- B. Complaint form and procedure for the affected party to initiate the protocol
- C. Form to request action in cases of sexual harassment and harassment based on sex, gender identity and/or sexual orientation in the workplace
- D. Informed consent document for people affected by the investigation of a case
- E. Form requesting application of precautionary measures
- F. Form for convening the Inquiry Committee
- G. Form for final report of the Inquiry Committee
- H. Interviewing complainants, accused and witnesses in cases of harassment

**A. Request for study of annexed documentation in sealed envelope**

Name and surnames

National or foreigner ID no.

Relationship with ICAC:

- Research staff, associate research staff or visiting research staff
- Research support staff
- Invited teaching staff
- Student
- Work placement staff
- External

Email address:

Contact phone no.:

**I request that the enclosed sealed envelope be examined in order to safeguard the confidentiality of the data therein. Organic Law 3/2018 of 5 December on the protection of personal data and ensuring digital rights**

Signature, date and location

**Director of the Catalan Institute of Classical Archaeology**

**B. Complaint by the affected person and initiation of the ICAC protocol to prevent, identify and take action against situations of sexual harassment and harassment based on sex, gender identity and sexual orientation**

*Details of person lodging complaint (the affected person)*

Name and surnames

National or foreigner ID no.

Age

Sex/gender

Relationship with ICAC:

- Research staff, associate research staff or visiting research staff
- Research support staff
- Invited teaching staff
- Student
- Work placement staff
- External

Email address:

Contact phone no.:

*Details of the person who is the object of the complaint (accused person)*

Name and surnames

Relationship with ICAC:

- Research staff, associate research staff or visiting research staff
- Research support staff
- Invited teaching staff
- Student
- Work placement staff
- External

Names and surnames of possible witnesses

<p><b>Description of the events</b> or behaviours considered to be sexual harassment or harassment based on gender, sexual orientation, gender identity or gender expression (indicate dates, duration, frequency of the events and all information you deem significant for identifying these behaviours as harassment).</p>
<p><b>Do you require additional support</b> (psychological counselling, legal advice, etc.)?</p> <p><input type="checkbox"/> Yes (please specify)</p> <p><input type="checkbox"/> No</p>
<p>Level of urgency</p> <p><input type="checkbox"/> Urgent</p> <p><input type="checkbox"/> Other:</p>
<p><b>I HEREBY GIVE MY EXPRESS CONSENT</b> to initiate the Catalan Institute of Classical Archaeology protocol for preventing, identifying and taking action to combat sexual harassment and harassment based on sex, gender identity and/or sexual orientation.</p>
<p>Signature, date and location</p>

In accordance with Organic Law 3/2018 of 5 December on the protection of personal data and ensuring digital rights, you are hereby informed that your data will be included in a file in the custody of ICAC which is legally registered in the General Data Protection Register of the Catalan Data Protection Authority with name 'Clients'. This data will be treated confidentially and used solely for the purpose of managing provision of the institute's services. The ICAC has adopted the security measures required in accordance with the level of data confidentiality and has the necessary technical and organisational measures in place to prevent loss, alteration, improper use and unauthorised access to the data. Having read this clause, you acknowledge that you are aware of the destination and use of your data and give your consent for both. To exercise your rights of access, rectification, erasure and restriction of



processing, please contact ICAC in writing (Plaça d'en Rovellat s/n, 43003 Tarragona, Spain or at [info@icac.cat](mailto:info@icac.cat)).

**C. Form for requesting intervention in a case of sexual harassment or harassment based on sex, gender identity and/or sexual orientation in the workplace**

**Details of person making the request**

Name and surnames

National or foreigner ID no.

Age

Sex/gender

Relationship with ICAC:

- Research staff, associate research staff or visiting research staff
- Research support staff
- Invited teaching staff
- Student
- Work placement staff
- External

Email address:

Contact phone no.:

**Details of the alleged victim**

Name and surnames

National or foreigner's ID no.

Age

Sex/gender

Relationship with ICAC:

- Research staff, associate research staff or visiting research staff
- Research support staff
- Invited teaching staff
- Student
- Work placement staff
- External

Email address:

Contact phone no.:

<b>Details of the person who is the object of the complaint (accused person)</b>
Name and surnames
Relationship with ICAC: <ul style="list-style-type: none"> <li><input type="checkbox"/> Research staff, associate research staff or visiting research staff</li> <li><input type="checkbox"/> Research support staff</li> <li><input type="checkbox"/> Invited teaching staff</li> <li><input type="checkbox"/> Student</li> <li><input type="checkbox"/> Work placement staff</li> <li><input type="checkbox"/> External</li> </ul>
<b>Attached documentation</b> <ul style="list-style-type: none"> <li><input type="checkbox"/> Yes (please specify)</li> <li><input type="checkbox"/> No</li> </ul>
<b>Description of the events</b> or behaviours considered to be sexual harassment or harassment based on gender, sexual orientation, gender identity or gender expression (indicate dates, duration, frequency of the events and all information you deem significant for identifying these behaviours as harassment).          
Signature, date and location
<i>The signed original is for the rapporteur. A photocopy will be provided to the claimant.</i>

In accordance with Organic Law 3/2018 of 5 December on the protection of personal data and ensuring digital rights, you are hereby informed that your data will be included in a file in the custody of ICAC which is legally registered in the General Data Protection Register of the Catalan Data Protection Authority with name 'Clients'. This data will be treated confidentially and used solely for the purpose of managing provision of the institute's services. The ICAC has adopted the security measures required in accordance with the level of data confidentiality and has the necessary technical and organisational measures in place to prevent loss, alteration, improper use and unauthorised access to the data. Having read this clause, you acknowledge that you are aware of the destination and use of your data and give your consent for these. To exercise your rights of access, rectification, erasure/being forgotten and restriction of processing, please contact ICAC in writing (Plaça d'en Rovellat s/n, 43003 Tarragona, Spain or at [info@icac.cat](mailto:info@icac.cat)).

#### D. Form for convening the Inquiry Committee

In accordance with the application of the ICAC protocol for preventing, identifying and taking action to combat sexual harassment and harassment based on sex, gender identity and/or sexual orientation, approved by the Executive Council on 11 December 2020, the director of the institute has resolved to convene the Inquiry Committee to address the complaint with reference code ....., submitted on .....

The people appointed to make up the committee are as follows:

- Person appointed by management (name and position at ICAC)
- Person appointed by the workers' representatives (name and position at ICAC)
- Person appointed by the Equality Committee (name and position at ICAC)

Where appropriate, the committee may call upon a person specialising in law or another field relevant to the investigation process initiated by the Inquiry Committee. The names and specialities of these people will be included in the corresponding report.

Committee members will undertake to carry out the functions set out in the protocol, to conclude the investigation process with the issuance of a report assessing the process with conclusions and proposals which must be approved by the majority of the members.

The committee will be dissolved after the members have carried out their functions.

Signed,

Chair of the committee

Tarragona, (date) .....

## E. Form requesting application of precautionary measures

By virtue of submittal of a request by ..... (indicate title, position or relationship with ICAC without revealing the names of the parties involved) to activate the Catalan Institute of Classical Archaeology protocol for preventing, identifying and taking action to combat sexual harassment and harassment based on sex, gender identity and/or sexual orientation, and, given circumstances that have come to light from interviewing those directly or indirectly involved, which are essential for adopting proposed interim measures, the Chair of the Inquiry Committee

HEREBY REQUESTS that the body to which this is addressed apply the following interim measures

for the following reasons:

The Chair of the Inquiry Committee will provide the identity of those involved if required for the adoption of the requested precautionary measures.

Signed,

Name and date

Director of the Catalan Institute of Classical Archaeology

## F. Form for final report of the Inquiry Committee

The report will include at least the following information:

- The identity of the person or people allegedly harassed and the person or people accused of harassment.
- A list of all people who have taken part in the inquiry and in preparing the report.
- Background of the case, complaint and circumstances.
- Other actions: evidence, summary of main facts and actions taken. When witnesses are interviewed, in order to safeguard confidentiality, the summary of the interview should not indicate who made each statement, but only whether or not the events under investigation have been substantiated.
- Aggravating circumstances are considered to be:
  - If the accused party is a repeat offender of acts of harassment.
  - If two or more people were harassed.
  - If there is evidence of intimidating or retaliatory behaviour by the harassing person.
  - If the harassing person has decision-making power in the employment relationship with the harassed person.
  - If the harassed person has any type of disability.
  - If the physical or psychological state of the person harassed is accredited by medical personnel as having been seriously affected.
  - If pressure or coercion is applied on the person harassed, witnesses or other people in their work or family environment with the aim of preventing or hindering the investigation.
- Report of conclusions.
- Specific measures proposed.
- A short- or medium-term deadline for monitoring and reviewing the implementation of measures and verifying the absence of sexual harassment or harassment on the basis of sex, gender identity and/or sexual orientation.
- Signature and date of the report.

The Inquiry Committee's report will be sent to the director of the institute.

## **G. Interviewing complainants, accused and witnesses in cases of harassment**

### **BASIC INTERVIEW GUIDE (AFFECTED PERSON)**

- A. IDENTITY OF AFFECTED PERSON**
  - a. Name and surnames
  - b. Position/Area of responsibility
  - c. Relationship with ICAC (direct / indirect)
  - d. Employment relationship with person reported
- B. IDENTITY OF ACCUSED PERSON**
  - a. Name and surnames
  - b. Position/Area of responsibility
  - c. Relationship with ICAC (direct / indirect)
  - d. Employment relationship with affected person
- C. CONTEXT IN WHICH THE CONDUCT TOOK PLACE**
  - a. Description of location
  - b. Description of activities being undertaken at the time
  - c. Description of the role of both people (complainant + respondent)
- D. DESCRIPTION OF BEHAVIOURS**
  - a. Characteristics (please provide a free and uninterrupted account describing the events as accurately as possible)
  - b. Dates and times
  - c. Frequency of occurrence
  - d. Repetition of conversations, phrases, etc.
  - e. Rejection of behaviours (avoiding situations, avoiding contact)
  - f. Background (previous behaviours, repetition of behaviours, relationship of harassing behaviours to other behaviours)
- E. COLLECTING EVIDENCE**
  - a. Witness who testify (on the described behaviours)
  - b. Written / audio-visual evidence
  - c. Medical evidence
  - d. Other
- F. CONSEQUENCES OF BEHAVIOURS**
  - a. Health impacts
  - b. Family effects
  - c. Effects on work relationships
  - d. Other
- G. EXTERNAL CARE AND/OR COUNSELLING REQUIREMENTS**
  - a. Psychological care
  - b. Legal counselling
  - c. Other

## BASIC INTERVIEW GUIDE (ACCUSED PERSON)

- A. IDENTITY OF ACCUSED PERSON
  - a. Name and surnames
  - b. Position/Area of responsibility
  - c. Relationship with ICAC (direct / indirect)
  - d. Employment relationship with person reported
- B. DISCLOSURE OF EVENTS REPORTED<sup>4</sup>
  - a. Context in which the alleged conduct took place
  - b. Description of the conduct
- C. RESPONDENT'S RESPONSE TO ALLEGED CONDUCT
  - a. Reaction to the conduct described
  - b. Reaction to any possible written or audio-visual evidence
  - c. Reaction to any possible witnesses to the conduct
  - d. Other
- D. INFORMATION ON POSSIBLE CONSEQUENCES FOR THE CONDUCT AND RESPONDENT'S RIGHTS
  - a. Information on past, current and future steps in the procedure
  - b. Information on possible precautionary and/or disciplinary measures, if applicable
  - c. Information on the respondent's rights

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<sup>4</sup>It is important that detailed information is provided, but maintaining certain limitations and taking care not to embarrass the complainant (the person affected by the conduct). This step is purely for collecting information.



## BASIC INTERVIEW GUIDE

(WITNESS)

### A. IDENTITY OF WITNESS

- a. Name and surnames
- b. Position/Area of responsibility
- c. Relationship with ICAC (direct / indirect)
- d. Employment relationship with person reported

### B. DISCLOSURE OF EVENTS REPORTED<sup>5</sup>

- a. Context in which the alleged conduct took place
- b. Description of the conduct

### C. SUPPLEMENTARY INFORMATION ABOUT THE ALLEGED CONDUCT

- a. Background of alleged conduct
- b. As many details as can be recalled about the conduct (context, dates, specific facts, people involved, etc.)
- c. Provision of evidence (written, audio-visual, etc.)

### D. INFORMATION ON THE RIGHTS<sup>6</sup> OF THE PARTIES INVOLVED

- a. Information on past, current and future steps in the procedure
- b. Information on possible precautionary and/or disciplinary measures, if applicable
- c. Information on the complainant's and the respondent's rights.

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<sup>5</sup>In the step, it is important that detailed information be provided, while maintaining certain limitations and taking care not to embarrass the complainant (the person affected by the conduct). This step is purely for collecting information from those that have offered to testify.

<sup>6</sup>Witnesses should be reminded that they may not reveal the identity of those involved in the proceedings at any time, inside or outside the workplace.

The ICAC is a consortium formed by:



The ICAC is a CERCA centre

