

Protocol for the prevention of and action against sexual harassment, harassment based on sex, sexual orientation, gender identity or gender expression

CIMNE – International Centre for Numerical Methods in Engineering



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1. PROTOCOL REASONING

1.1. INTRODUCTION

Equality is a fundamental value that has been added, at different levels, to our national and international legal framework. Despite the progress made and the recognition of rights established by social norms, reality continues to present us with inequalities and discrimination in different areas of social life.

One manifestation of such discrimination is sexual harassment and harassment based on sex, which occurs in the workplace.

Consequently, on the basis of the legislation listed below, and CIMNE's explicit commitment to prevent and eradicate situations of sexual harassment and harassment based on sex, sexual orientation, gender expression or identity, within the organisation and the relationships that occur therein, we have created this Protocol for the prevention and response to sexual harassment and harassment based on sex, sexual orientation, gender expression or identity.

1.2. CIMNE'S COMMITMENT

CIMNE, in compliance with current legislation and in its commitment to prevent and eradicate situations of sexual and gender-based harassment, as well as to create a safe workplace, establishes this marker of and commitment to labour relations based on freedom, respect and equality between people.

The protocol, as well as being a commitment in line with its zero-tolerance stance on harassment, adopts two lines of action:

- Prevention: measures to anticipate possible and future cases of harassment (actions to raise awareness among the entire workforce, providing tools to prevent, warn and detect harassment situations).
- Action: internal mechanisms are provided for resolution in the event of harassment and contacts are made available for persons to facilitate resolution.



2. LEGISLATION AND SCOPE

2.1. LEGISLATION

Harassment in the workplace is a violation of the fundamental rights recognised in numerous international and national texts. Personal dignity, equality, non-discrimination on grounds of sex, physical and moral integrity, the right to respect, to personal and family privacy, and to one's own image, are rights recognised in the Spanish Constitution (art. 10.1, 14, 15 and 18.1 CE).

At the Community level, **Directive 2006/54/CE** 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 and occupation defines sexual and gender-based harassment and establishes that such situations shall be considered discriminatory and shall therefore be prohibited and sanctioned in an appropriate, proportionate and dissuasive manner. The **Community Code of Conduct to Combat Sexual Harassment of 27 November 1991** is the European standard in the field of prevention.

At the national level, the action of work organisations to prevent and intervene against sexual and gender-based harassment behaviour and conduct is legitimised as a mandatory requirement through the Organic Law 3/2007, of 22 March, on effective equality between men and women (LOIEMH).

The LOIEMH has detailed the obligations of work organisations in relation to sexual harassment and gender-based harassment, establishing in **Article 7** that these types of harassment are considered discriminatory acts or conduct. In addition, **Article 48** states that companies must:

"1. (....) promote working conditions that prevent sexual harassment and harassment based on sex and establish specific procedures for its prevention and for dealing with any complaints or claims that may be made by those who have been subjected to it. To this end, measures may be established which must be negotiated with the workers' representatives, such as the drawing up and dissemination of codes of good practice, the implementation of information campaigns or training activities".

Likewise, the Legal Representation of Workers must contribute to the prevention of sexual harassment and gender-based harassment at work by raising awareness among the workforce,



and to inform the company's management if they become aware of such conduct or behaviour, or of any conduct or behaviour that could lead to it (art. 48.2).

Understanding harassment as a psychosocial risk at work that can affect the health and safety of those who suffer it, companies, as stipulated by the Law 31/1995, of 8 November, on the **Prevention of Work Risks**, are obligated to adopt measures to protect the safety and health of their workforce.

In terms of sanction, Law 5/2000, of 4 August, on Offences and sanctions in social order (art. 8.13) considers sexual harassment and gender-based harassment serious breaches of social order when they occur within the scope of the company's management responsibilities, whoever the active subject of the harassment may be.

Technical Criteria for Work Inspection 69/2009 on Work and Social Security Inspection Action in the area of harassment and violence at work considers a failure to prevent, assess and take preventative measure against gender-based violence in the workplace.

At the regional level, this protocol is also attached to Law 11/2014 of 10 October to guarantee the rights of lesbian, gay, bisexual, transgender and intersex persons and to eradicate homophobia, biphobia and transphobia, which states in article 2:

"The purpose of this law is to establish the conditions under which the rights of lesbian, gay, bisexual, transgender and intersex people, and the groups they belong to, are real and effective; to facilitate their participation and representation in all areas of social life; and to contribute to overcoming stereotypes that negatively affect the social perception of these people."

All spaces must respect sexual and affective diversity, people's gender identity and the different family models that exist. The aim is to create an inclusive and respectful environment for everyone.

2.2. SCOPE

This Protocol applies to all situations arising from any activity that takes place in the working environment of CIMNE and to all the centre's staff, without any distinction based on their link to or permanence in the organisation.



The protocol applies to any person who carries out activities or provides services in the centre, even if they report to another entity.

To this end, Centre Management will inform all the staff of its various work centres of the explicit commitment of the entity's policy to combat sexual harassment and harassment based on sex and of the existence of this protocol.

The Protocol will remain accessible on the transparency portal of the entity, on the Intranet, as well as in the Human Resources Department.

3. OBJECTIVES

3.1. GENERAL OBJECTIVES

Ensure a safe working environment free from sexual harassment and harassment based on sexual orientation, gender expression or gender identity.

3.2. SPECIFIC OBJECTIVES:

- Understand how to differentiate between sexual harassment, harassment based on sex or harassment based on sexual orientation, gender identity or gender expression in the workplace.
- To implement actions quickly in the face of this type of situation, safeguarding the security, privacy and confidentiality of the people involved in the events.
- Provide a tool for reporting and protecting people who may suffer a situation of harassment.
- Define standardised procedures for dealing with situations of sexual harassment or harassment based on sex.
- Provide an action toolset for personnel responsible for the safety and well-being of the workforce.



4. CONCEPTS AND DEFINITIONS

4.1. SEXUAL HARASSMENT

Sexual harassment is any unwanted verbal or physical behaviour of <u>a sexual nature</u> that has the purpose or effect of violating the dignity of a person or creating an intimidating, hostile, degrading, humiliating, offensive or upsetting environment. Unlike psychological harassment at work, such behaviour is considered sexual harassment even if it does not occur repeatedly or systematically. A single action, because of its seriousness, can constitute sexual harassment.

By way of explanation, and without being exclusive or limiting, the following are **examples** of sexual harassment.

4.1.1. VERBAL HARASSMENT

- Spreading rumours, asking about or explaining a person's sex life and/or sexual preferences.
- Making obscene sexual comments or jokes.
- Making vulgar comments about one's body or physical appearance.
- Offering or pressuring to set up committed dates or to engage in unwanted recreational activities.
- Making demands for sexual favours.

4.1.2. NON-VERBAL HARASSMENT

- Leering on the body.
- Obscene gestures.
- Use of sexually explicit graphics, cartoons, drawings, photographs or images from the Internet.
- Offensive letters, notes or e-mails of a sexual nature.

4.1.3. PHYSICAL HARASSMENT

- Excessive physical approach.
- Cornering; deliberately seeking to be alone with the person unnecessarily.
- Deliberate and unsolicited physical contact (pinching, touching, unwanted massage).
- Intentional or "accidental" touching of sexual body parts.



4.2. HARASSMENT BASED ON SEX

Any behaviour which, <u>because of a person's sex</u>, is carried out with the aim of violating their dignity or their physical or mental integrity or of creating an intimidating, hostile, degrading, humiliating, offensive or upsetting environment for them.

Examples of harassment based on sex:

- Using sexist humour.
- Ignoring a person's contributions, comments or actions.
- Ridiculing, belittling abilities, skills and potential because they are of a certain sex.
- Patronising or condescending attitudes.
- Creating a humiliating, intimidating or abusive work environment.
- Use of discriminatory behaviour on the basis of sex.
- Jokes and comments about people who take on tasks that have traditionally been carried out by people of the other sex.
- Use of demeaning or offensive language to address people of a particular sex.

4.3. HARASSMENT BASED ON SEXUAL ORIENTATION, GENDER IDENTITY OR GENDER EXPRESSION

Harassment based on sexual orientation, gender identity or gender expression is any behaviour based on a person's sexual orientation, gender identity or gender expression with the purpose or effect of violating their dignity or physical or psychological integrity, or of creating an intimidating, hostile, degrading, humiliating, offensive or upsetting environment (Law 11/2014).

Examples of this type of harassment include: engaging in the conduct described above against persons on the basis of their sexual orientation, gender identity or gender expression.

4.4. SEX

Category that defines the primary and secondary sexual characteristics of our body, traditionally classified into two categories, male and female, though not all bodies can be categorised in this way, as there are intersex people and people with differences in their sexual development.



4.5. GENDER IDENTITY

The gender with which a person identifies. Traditionally, gender is identified with one of the two sexes: man-woman/male-female. However, some people do not identify with the gender they were assigned at birth.

4.6. GENDER EXPRESSION

This is the way we manifest our gender through our behaviour and appearance. Gender expression can be masculine, feminine, androgynous or any combination of the three. A person's gender expression is not always linked to their biological sex, gender identity or sexual orientation.

4.7. AFFECTIVE SEXUAL ORIENTATION

This is related to the object of desire (heterosexual, bisexual, homosexual...) or the absence of sexual desire (asexuality).

5. TYPES OF HARASSMENT

5.1. HORIZONTAL HARASSMENT

Where the person doing the harassing is at the same hierarchical level as the person being harassed.

5.2. VERTICAL HARASSMENT (TOP-DOWN)

Where the harassment is carried out by a person in a superior hierarchical position. Abuse of hierarchical superiority is considered a serious aggravating condition.

5.3. VERTICAL HARASSMENT (BOTTOM-UP)

Less common is where sexual harassment is carried out by a person subordinate to their hierarchical superior.



5.4. ENVIRONMENTAL HARASSMENT

Behaviour that creates an intimidating, hostile, offensive environment: comments of a sexual nature, jokes, etc. Usually requires insistence and repetition of actions, depending on the severity of the behaviour.

5.5. QUID PRO QUO HARASSMENT

This occurs when the person being harassment is forced to choose between submitting to sexual demands or losing certain benefits or conditions at work, i.e. sexual blackmail. The person's refusal of conduct of a sexual nature is used to deny them access to occupation, training, promotion, salary increase or any other decision about work, implying an abuse of authority. Active subjects of this type of harassment are therefore those who have the power to decide on the employment relationship, i.e. any person hierarchically superior in the organisation.

6. PRINCIPLES AND GUARANTEES

The following principles shall be respected in both the approach and resolution of the processes:

- 1. Respect and protection: Protection of intimacy and dignity of those affected.
- 2. **Confidentiality:** The information collected is confidential. Health data and information about the process, in general, are entered into the file with the express permission of the person concerned.
- 3. **Right to information**: Everyone involved has the right to be informed about the process, their rights and duties, about which phase is taking place, and, depending on the profile, to know the outcome of the phases.
- 4. **Health care:** In a harassment situation, individuals can request care, counselling and a medical report. If harassment is established, the medical leave should be considered as an accident at work.
- 5. **Diligence and quick processing:** The procedure provides information on deadlines for the resolution of the stages for a timely resolution of the complaint.
- 6. **Fair treatment:** An impartial hearing acting in good faith and fair treatment of all persons involved is guaranteed.



- 7. **Protection against possible retaliation:** No person involved should suffer retaliation for participating in the reporting or complaint process of a harassment situation.
- 8. **Cooperation:** All persons who are summoned in the course of the proceedings have a duty to involve themselves in the proceedings and to cooperate with them.
- Precautionary measures: If during the process and until closure there are indications of harassment, the persons in charge of the different phases of intervention can propose to the management of the centre to adopt precautionary measures; without undermining the working conditions.
- 10. **Help from trained personnel:** The company employs trained personnel throughout the entire procedure.

7. RIGHTS AND OBLIGATIONS

7.1. CIMNE

- 1. Guarantee the right of workers in the employment relationship not to be sexually discriminated against on the basis of their sex, gender identity, affective sexual orientation or gender expression, to physical and psychological integrity, to an adequate health and safety policy, to respect for their privacy and to due consideration for their dignity.
- 2. Promote a work context and environment that avoids harassment.
- **3.** Establish specific procedures for the prevention, detection and resolution of situations of harassment.

Failure by the centre to comply with its obligations may result in administrative and judicial liability.

7.2. WORKERS

1. Rights: they have the right to a healthy work environment and to not suffer from harassment.



2. Obligations: all staff have an obligation to treat individuals with respect when a complaint is activated and to cooperate in the investigation of a possible case of harassment. This obligation will apply at all times and in all areas of the work environment.

7.3. LEGAL REPRESENTATION OF WORKERS

The Workers' Legal Representation will contribute to the prevention of sexual harassment, harassment based on sex or sexual orientation, gender identity or gender expression at work by raising awareness among workers and informing the company's management of any conduct or behaviour of which they may be aware and which could be conducive to such harassment. At present, the entity does not have a Workers' Legal Representation. As such, this protocol will be validated within the Negotiating Committee of the entity's Equality Plan.

8. PROTOCOL DELIVERY

The first precautionary measure to prevent sexual and gender-based harassment is to inform the staff of the creation and application of this protocol. The specific actions are as follows:

- 1. Send a mass mailing to all employees informing them of the protocol.
- Introduce the protocol in the documentation available on the Intranet and on the Transparency Portal of the entity.
- **3.** Make the protocol physically available in each work centre, either in its entirety or in a triptych or summary in a visible place, for example, on notice boards.
- 4. Conduct awareness-raising talks.
- 5. Train the relevant personnel.
- 6. Incorporate the protocol in the welcome manual.

9. CHANNELS FOR REPORTING

In order to offer advice to people who feel they have been harassed and to resolve the situation in those cases where this is possible, the entity has appointed a series of **Contact Persons** who will form part of the **Investigating Committee** in the event of the initiation of an investigation procedure and investigation of the complaint.



The **Contact Persons** who will make up the CIMNE **Investigating Committee** are the following:

Contact person	Department/ group	Contact details	
Laura Bermúdez	Communication	Building C1 Office C15 Ibermudez@cimne.upc.edu	93 401 60 37
Francisco de la Rosa	Publications	Building C1 Office C2 fdelarosa@cimne.upc.edu	93 401 60 37
Anna Monros	Pre and Post Processing	Building B0 Office 104 monros@cimne.upc.edu	93 401 25 59
Mar Mesa	Human Resources	Building C1 Office C1 mmesa@cimne.upc.edu	93 401 65 49
Irene Martínez	Human Resources	Building C1 Office C1 imartinez@cimne.upc.e	93 401 65 49

The roles of the contact persons are as follows:

- Inform and advise the persons involved.
- Accompany the affected persons throughout the process.
- Propose the adoption of precautionary and/or preventative measures.

10. ACTION PROTOCOL

10.1 EVENT REPORTING



- This will be initiated once any of the Contact Persons becomes aware of a situation of harassment. This communication may be made by the alleged victim, by the legal representatives of the workforce, or by any person who has knowledge of the situation, following the reporting channels detailed in the previous point.
- The contact person(s) to whom the complaint has been notified should be aware of whether the action is classified as minor, serious or very serious. In the case of serious or very serious cases, they will go directly to Section 10.2, with the submission of an internal complaint.
- 3. Within a maximum period of 3 calendar days from receipt of this communication, the Contact Person(s) shall meet with the person who reported the events and with the possible victim, if different, and with the alleged aggressor separately.
- 4. Within a maximum of 10 calendar days of the first communication, a report of the findings and conclusions shall be made to the Human Resources Department. The alleged victim and then the alleged harasser shall be informed of the measures taken, without disclosing personal information of either party.
- 5. The report needs to specify whether the process is concluded or whether there is an agreement to open an internal complaint process.

10.2. INTERNAL COMPLAINT

A complaint procedure will open when:

- An agreement has not been reached or the person who believes they are being harassed does not agree with the proposed measures.
- The alleged aggressor assumes their actions with malicious intent.
- The harassing conduct(s) have not ceased even though the harasser has interacted with the persons concerned.
- The case is serious or very serious.



The **internal complaint procedure must be diligent**, both to put an end to the harassing conduct as soon as possible and mitigate the possible effects on the victim, and to avoid damaging the interests of the person reported. A **maximum period of 20 calendar days** is established for the processing and resolution of complaints.

10.2.1. PRESENTATION OF INTERNAL COMPLAINT

A written complaint should be drawn up using the attached model (Annex 1), which shall be sent to the Contact Person(s) who supervised the previous phase.

10.2.2. INVESTIGATION OF REPORTED EVENTS

Once the complaint has been received, the Contact Persons will form what will be known as the Investigating Committee. The Investigating Committee shall carry out as many proceedings, tests and actions as it deems appropriate to clarify the facts reported, hearing all parties, witnesses and other persons who are deemed to be able to provide information. It shall also issue a binding report on the existence or not of a situation of harassment and shall propose intervention measures.

By way of example and without being limiting, the **Investigating Committee** will be in charge of:

- **1.** Analysing the complaint and the accompanying documentation.
- 2. Interviewing the person making the complaint and informing them of the procedure and possible courses of action, as well as the right to health surveillance. If the facts are not sufficiently described in the complaint, an additional account of the facts will be requested.
- 3. Interviewing the person being reported against.
- 4. Interviewing possible witnesses.
- 5. Assessing whether precautionary measures are necessary.
- **6.** Issuing the binding report.

In the event that the management itself could be implicated in the perpetration of the facts, the complainant may, exceptionally, address the complaint to the HR department of the entity, which will be responsible for managing the investigation in accordance with the protocol in force or by appointing an internal or external person with appropriate training in the prevention of harassment to investigate the complaint process.

¹ In the event that the alleged acts are directed against any of the members of the Investigating Committee, the complainant may, exceptionally, address the complaint to the Centre Management, who shall designate an internal or external person with appropriate training in the prevention of harassment to investigate the complaint process.



It is important to understand that:

- I. The person making the complaint only has to provide evidence that substantiates the harassment, and it is up to the alleged harasser to prove its absence, in line with the procedural principle of the reversal of the burden of proof.².
- II. The persons involved in the procedure are obliged to maintain strict confidentiality and reserve, and must not pass on or divulge information about the content of the complaints filed, resolved or under investigation of which they are aware.

In accordance with the principle of confidentiality, the person(s) responsible for the initiation and processing will assign **identifying code numbers** to both the alleged harassed person and the alleged harasser to preserve their identity in the process and the report.

10.2.3. BINDING REPORT

The investigation process concludes with a **binding report** which includes the conclusions reached after the investigation and proposes corrective measures deemed appropriate. The report also identifies the following elements:

- The person alleged to have been harassed and the harasser.
- The names of the persons involved in the investigation and in the preparation of the report.
- Background to the case, complaint and circumstances.
- Other actions: evidence, summary of the main facts and the actions taken. When witness interviews have been carried out, and in order to guarantee confidentiality, the summary of this action should not indicate who made the statement, but only whether or not the reality of the facts investigated is established.
- Aggravating circumstances observed.
- Conclusions
- Corrective measures

²In this regard, **Article 32.2.e. of Law 17/2015, of 21 July, on effective equality of women and men**, which applies to Catalonia but which we consider to be applicable to all companies:

"In this type of complaint and claim, the principle of reversal of the burden of proof must be applied, according to which when the acting or interested party alleges this type of harassment and provides substantiated evidence, it is up to the defendant, or to whom the harassment is imputed, to provide an objective and reasonable justification, sufficiently proven, of the measures taken and their proportionality".



About the precautionary measures:

In the event of a complaint, and until the end of the procedure, the Centre Management may, at the suggestion of the Investigating Committee, adopt a precautionary measure in the event of particularly serious situations or situations in which the facts reported constitute reliable evidence of the existence of one of the prohibited conducts.

In addition, the precautionary measures that may be adopted must be **reasonable and proportionate** to the objective they are intended to achieve. Mainly, they will try to prevent new events from occurring during the investigation that aggravate the situation, causing greater harm to the affected worker(s).

Some of these measures might be:

- A change of jobs and/or work shifts, preferably of the alleged harasser or, if this is not possible, of the victim, at the initiative of the person handling the case or at the request of a party.
- Establishment of monitoring and control guidelines to ensure that the situation reported is not repeated.
- Making available to the victim, if so requested, the medical attention of a doctor assigned to the workplace risk prevention service.

10.2.4. RESOLUTION

In accordance with the binding report drawn up by the Investigating Committee, the Centre Management shall issue a decision on the case within a **maximum of 30 calendar days** of receipt of the complaint.

If the investigation reveals evidence to support the allegation of harassment, the alleged harasser will be subject to disciplinary action as set out in Chapter XIV of the Collective Agreement in force at the centre. These **disciplinary measures** may include suspension or dismissal, and the incident will be documented and filed in their personnel file.

Acts and conduct of sexual harassment and harassment on based on sex are cases of serious and very serious misconduct, contrary to the values of the centre, and will not be permitted or tolerated.



The misconduct shall be classified and the corresponding penalties shall be imposed in accordance with the provisions of the disciplinary regime set out in the Collective Agreement in question and in **Royal Legislative Decree 5/2000, of 4 August, approving the revised text of the Law on Offences and Sanctions in Social Order.** In determining the sanction, it will be necessary to include those situations that are aggravating factors, which may include:

- The particular vulnerability of the victim (job and contractual precariousness, disability, age).
- Subordination to the aggressor.
- Repetition of the offensive conduct after the complainant has used the resolution procedures.
- Recurrence of the harassing conduct.
- The fact that several people have suffered harassment simultaneously.
- Existence of intimidating, retaliatory or coercive behaviour on the part of the aggressor towards the victim, the persons who have testified or those carrying out the investigation.

In other cases, non-compliance shall be punishable by a **serious sanction**, and false or unfounded complaints shall also be punishable as serious non-compliance.

An authenticated copy of this resolution shall be sent to the person making the complaint and to the person against whom the complaint has been made.

Likewise, whether the case results in a sanction or not, a review of the employment situation of the person who has filed the complaint will be carried out.

10.3. EXTERNAL COMPLAINT

This refers to reporting outside the centre, such as through administrative channels: **Work inspection and labour or criminal jurisdiction**.

The timing and appropriateness of each process will depend on a number of factors to be considered:

- The severity and extent of the incidents.
- The position of the alleged harasser in relation to the person being harassed (significant differences in power, status, etc.).
- Whether the incidents are occurring for the first time or have occurred previously.



- The willingness of the person experiencing the situation.

11. MONITORING AND EVALUATION

To ensure the effectiveness of the protocol, indicators and evaluation criteria have been established.

The Investigating Committee will meet twice a year. At these meetings, the measures carried out will be evaluated, both in terms of dissemination and awareness-raising and, where appropriate, in terms of action. At the end of each period, a report on the conclusions will be submitted to the Centre's management and to the Equality Committee.

11.1. PREVENTATIVE ACTION

	Action	Date
1	Approve the protocol for the prevention of and action against sexual harassment, harassment based on sex, sexual orientation, gender identity or gender expression.	30/06/2021
2	Disseminate the protocol to all staff.	
3	Incorporate information on sexual harassment, harassment based on sex, sexual orientation, gender identity or gender expression in the welcome documentation for new employees.	
4	Train Contact Persons and members of the Human Resources Department on sexual harassment, harassment based on sex, sexual orientation, gender identity or gender expression.	
5	Carry out an awareness-raising campaign.	



11.2. ACTION INDICATORS

Indicator	Outcome
Situations communicated	Number of people that have reported sexual harassment or harassment based on sex, separated by sex.
	Percentage of total number of workers.
Situations complained of	Number of people that have reported sexual harassment or harassment based on sex, separated by sex.
	Percentage of total number of workers.
Outcomes	Number of sanctioning procedures that have been carried out in the company throughout the year.
	Number and type of corrective measures put in place.

The Annual Reports will contain full details of the preventive actions carried out during the year, as well as the value of the performance indicators.



ANNEX I: COMPLAINT MODEL

DATE DD/MM/YYYY

Person making the complaint

Name and surnames Enter your first and last name/s.

IDENTIFICATION CARD/NIE: Enter your document number

As:

- O Alleged victim
- O Unit colleague
- O Person who has witnessed the reported event/s
- O Other

Detail your relationship here:

Enter your telephone number

Reported situation

- O Sexual harassment
- O Harassment based on sex, sexual orientation, gender identity or gender expression

ALLEGED VICTIM (Complete if the alleged victim is not the person making the complaint):

Name and surnames Enter your first and last name/s.

IDENTIFICATION CARD/NIE: Enter your document number

Telephone Enter your telephone number

Email Enter your email address

Work information (in all cases):

Work unit:

Click or press here to write text.

.....



PERSON REPORTED

Name and surname/s

Work unit Area of work

Does the reported person work directly with the alleged victim?

O Yes

O No

Has the person complaining brought the situation to the attention of their superior?

- O Yes
- O No
- O The person reported is their hierarchical superior

DESCRIPTION OF EVENTS (dates, locations, hours...)

Write a description of the events here

.....

In order to evidence the above, the following are available:

O No specific evidence
O Evidencing documents
O Persons attesting to the reported situation
O Other
Indicate accreditation here
If applicable, indicate who the witnesses are:
Enter name and surname/s of the witnesses



Are there others who may be affected?

O Yes

O No

Please detail who these people may be (name and job role)

Enter the name and job role of those affected

.....

ANNEX DOCUMENTATION

O Yes

O No

Document list

Indicate presented documents

.....

SIGNATURES

Person making the complaint

Person reported