

# Information Sheet 6:

## Sample Sexual Harassment Policies

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1. Viet Nam Code of Conduct on Sexual Harassment in the Workplace (Ministry of Labour, the Viet Nam Chamber of Commerce and Industry and the Viet Nam General Confederation of Labour)
2. Sample sexual harassment policy and procedure (International Trade Union Confederation)
3. Sample sexual harassment policy (Klosters Brothers, South Africa Ethical Trading Initiative /WIETA)
4. Sample sexual harassment policy: ILO Pacific region

### 1. Viet Nam Code of Conduct on Sexual Harassment in the Workplace (2015)

*The Code of Conduct on Sexual Harassment in the Workplace was jointly produced by the Ministry of Labour, the Viet Nam Chamber of Commerce and Industry and the Viet Nam General Confederation of Labour in 2015. It aims to help employers and workers develop their own policy or regulation for preventing and addressing sexual harassment, and to promote healthy, safe, and productive workplaces. To lay the legal groundwork for a safe and healthy work environment, the 2012 Labour Code stipulates that sexual harassment is prohibited in the workplace. In order to implement the law and combat sexual harassment, the Viet Nam Industrial Relations Committee, which is chaired by the Ministry of Labour, Invalids and Social Affairs and includes the Viet Nam General Confederation of Labour and the Viet Nam Chamber of Commerce and Industry, have jointly developed this Code of Conduct on Sexual Harassment in the Workplace.*

### Sample Company Policy on Sexual Harassment

(NAME OF COMPANY/ORGANIZATION/AGENCY) is committed to providing a healthy, effective work environment where sexual harassment is not accepted because it is against the law, against social ethics and will not be tolerated. (NAME OF COMPANY/ORGANIZATION/AGENCY) will implement this policy in accordance with the Code of Conduct on Sexual Harassment in the Workplace. When (NAME OF COMPANY/ORGANIZATION/AGENCY) determines that an allegation of sexual harassment is credible, it will take prompt and appropriate corrective action.

“Sexual harassment” is defined as any behaviour of a sexual nature that affects the dignity of women and men, which is considered as unwanted, unacceptable, inappropriate and offensive to the recipient, and that creates an intimidating, hostile, unstable or offensive work environment.

Sexual harassment in the workplace can be physical, verbal or non-verbal, and include the major forms as follows:

- a. Physical forms of sexual harassment such as any unwanted contact, ranging from intentionally touching, caressing, pinching, hugging or kissing to sexual assault or rape.
- b. Verbal forms of sexual harassment include socially and culturally inappropriate and unwelcome comments with sexual overtones such as sexually suggestive jokes or comments about a person’s dress or body, made in their presence or directed toward them. They also include persistent proposals and unwelcome requests or persistent personal invitations to go out.

c. Non-verbal forms of sexual harassment include unwelcome gestures, suggestive body language, indecent exposure, lascivious looks, repeated winks, and gestures with fingers. It also includes the unwelcome display of pornographic materials, sexually explicit pictures and objects, screen savers or posters as well as sexually explicit e-mails, notes or SMS messages.

“Quid pro quo” (this for that) sexual harassment is committed when an employer, supervisor, manager or co-worker, undertakes or attempts to influence the process of recruitment, promotion, training, discipline, dismissal, salary increment or other benefit of an existing staff member or job applicant, in exchange for sexual favours.

“Workplace” refers not only to the specific location where work is being performed, such as an office or factory, but also to locations where work-related business may be conducted. These could include:

- Work related social activities, such as a reception organized by the enterprise for staff or clients, etc.;
- Conferences and training sessions;
- Official business travel;
- Business meals;
- Work related telephone conversations; and
- Work related communications through electronic media.

## The Company’s responsibilities in preventing and addressing sexual harassment

Any employee or those working for the company who believes that he or she is a victim of sexual harassment must immediately report any incident to (NAME AND CONTACT DETAILS OF PERSON/DEPARTMENT).

(NAME OF COMPANY/ORGANIZATION/AGENCY) will not tolerate retaliation against any person who makes a complaint of sexual harassment. It will take the necessary steps to ensure that the matter is thoroughly investigated and promptly addressed. If the allegation is determined to be credible, (NAME OF COMPANY/ORGANIZATION/AGENCY) will take immediate and effective measures to end the unwelcome behaviour. (NAME OF COMPANY/ORGANIZATION/AGENCY) is committed to taking action if it learns of possible sexual harassment, even without a formal complaint.

(NAME OF PERSON OR DEPARTMENT) is the main contact point for questions or concerns about sexual harassment. (NAME OF PERSON OR DEPARTMENT) has responsibility for investigating or overseeing investigations of alleged sexual harassment. (NAME OF COMPANY/ORGANIZATION/AGENCY) is committed to ensuring that all investigations of sexual harassment are conducted in a prompt, thorough, and impartial manner.

Supervisors and other responsible officials who observe, are informed of, or reasonably suspect incidents of possible sexual harassment must immediately report such incidents to (NAME OF PERSON OR DEPARTMENT), (who/which) will either initiate or oversee a prompt investigation. Failure to report such incidents to (NAME OF PERSON OR DEPARTMENT) will be considered a violation of this policy and may result in disciplinary action. (NAME OF PERSON OR DEPARTMENT) will provide guidance as needed on investigating and handling the alleged harassment. Supervisors should take effective measures to ensure that no further apparent or alleged harassment occurs pending completion of an investigation.

(NAME OF COMPANY/ORGANIZATION/AGENCY) will seek to protect the identities of the alleged victim and harasser, as reasonably necessary (for example, to complete an investigation successfully). (NAME OF COMPANY/ORGANIZATION/AGENCY) will also take the necessary steps to protect from retaliation those employees who in good faith report incidents. It is a violation of this policy and of the law to retaliate against someone who has reported possible sexual harassment, and violators may be subject to discipline.

Employees who have been found by (NAME OF COMPANY/ORGANIZATION/AGENCY) to have subjected another employee to unwelcome conduct of a sexual nature, and such behaviour meets the definition of sexual harassment, including “quid pro quo” sexual harassment identified in the Code of Conduct on Sexual Harassment in the Workplace, will be subject to discipline or other appropriate management measures. Discipline will be appropriate to the nature and the extent of the behaviour, and penalties ranging from a letter of reprimand to dismissal are allowed to be applied.

## Employees’ Rights and Responsibilities Under This Policy

Any employee who believes he or she has been the target of sexual harassment is encouraged to inform the alleged harasser orally or in writing that such conduct is unwelcome and offensive and must stop.

If the employee does not wish to communicate directly with the alleged harasser, or if such communication has been ineffective, the employee is encouraged to report the unwelcome conduct as soon as possible to (NAME OF PERSON OR DEPARTMENT).

In addition to reporting sexual harassment concerns to (NAME OF PERSON OR DEPARTMENT), employees who believe they have been subjected to sexual harassment may elect to pursue resolution either through informal channels including conciliation, mediation, counseling or informal discussions or through a formal investigation.

All (NAME OF COMPANY/ORGANIZATION/AGENCY) employees, including but not limited to staff, supervisors, and senior officials, are required to comply with this policy. Employees are also expected to behave professionally and to exercise good judgment in work-related relationships, whether with fellow employees, business colleagues, or members of the public with whom they come into contact in the course of official professional duties. Further, all employees are expected to take appropriate measures to prevent sexual harassment. Unwelcome behaviour of a sexual nature will not be tolerated.

**Source:** Viet Nam Chamber of Commerce and Industry and the Viet Nam General Confederation of Labour (2015) Viet Nam Code of Conduct on Sexual Harassment in the Workplace. Available at: [http://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-hanoi/documents/publication/wcms\\_421220.pdf](http://www.ilo.org/wcmsp5/groups/public/---asia/---ro-bangkok/---ilo-hanoi/documents/publication/wcms_421220.pdf)

## 2. Sample sexual harassment policy and procedure (International Trade Union Confederation)

*The sample policy and procedure, produced by the International Trade Union Confederation, provides a model for and guidance of what can be included in a sexual harassment policy and procedure that is agreed between an employer and trade union.*

### (a) Introduction

The union and the employer recognise that sexual harassment may occur in the workplace and are committed to preventing and ending it. Sexual harassment is also a disciplinary offence.

### (b) Definition

Sexual harassment is unwanted, unwelcome and unasked-for behaviour of a sexual nature. It can occur either on a one-time basis or as a series of incidents, however minor. Sexual harassment is coercive and one-sided and both males and females can be victims.

**(c) Action**

A harassment victim may lodge a harassment complaint with a person of confidence, designated by the union in agreement with the company.

The person(s) of confidence, who will be appropriately trained, shall investigate any harassment complaint, in a timely fashion and on a confidential basis.

An employee alleging harassment in the workplace has the right, after informing the person of confidence, to leave the work area without loss of pay, rights or benefits, and to refuse to return to the work area until there has been an investigation of the complaint.

The redress must reflect the seriousness of the harassment case. It may be an apology, a transfer to another department or a layoff. The harasser, not the victim, must suffer the consequences of his or her actions.

The employers will include compulsory anti-sexual harassment training in its orientation for new employees in company time.

**Model Procedure for Dealing with Sexual Harassment****(a) Introduction**

- Any employee who believes s/he has suffered or is suffering sexual harassment has the right to raise it through the following procedure.
- If the victim does not want to make a formal complaint, the employer still has an obligation to consider whether the event should be investigated.

**(b) Appointing 'persons of confidence'**

- The union and the employer should appoint several persons of confidence designated to deal with complaints of sexual harassment. These should be of both sexes and appropriately trained.

**(c) Keeping a log book – respect confidentiality**

- The union and/or the employer should keep a book in which to note down complaints. This should be kept in a locked drawer.
- At all times both the victim and the alleged harasser have a right to absolute confidentiality.

**(d) Draw up a list of behaviour that constitutes sexual harassment****(e) Dealing with the complaint informally**

There may be occasions when the victim feels able, and prefers, to deal with the complaint informally. However, s/he should not be persuaded against her/his will not to make a formal complaint. Employees who have been harassed can decide to resolve it informally by:

- Approaching the alleged harasser, with the support of a person of confidence, colleague or trade union representative, saying that the behaviour is offensive, unwelcome and should be stopped.
- Asking one of the designated persons of confidence to approach the alleged harasser on his/her behalf.

- The employee may decide not to approach the harasser, but simply to log the complaint with one of the designated persons of confidence, to ensure that any refusal to comply with sexual requests does not later affect job prospects.
- The informal complaint should be noted in the log book.
- The alleged harasser should be informed of the complaint made against him/her and given the opportunity to amend his/her behaviour. Any logged complaints should trigger either informal or formal proceedings.

#### (f) Dealing with complaints formally

##### The alleged victim:

- Employees should approach one of the persons of confidence to make a complaint, and the date of this complaint should be logged.
- A person of confidence should invite the employee to a meeting. If required the employee may be accompanied by a trade union representative/shop steward or colleague.
- The detailed complaint should be set out in writing in the log book.
- At the meeting, the victim should be told that the complaint will be investigated and witnesses questioned, and that the alleged harassed person has a right to a fair hearing.
- If the alleged action is serious, then it may be necessary to relocate or temporarily suspend the alleged harasser.

This investigation is part of the official company grievance procedure.

##### The alleged harasser:

- The alleged harasser, who may be accompanied by a trade union representative/shop steward or colleague, meets with the person of confidence, is informed about the complaint, and given a chance to answer the allegation.
- The harasser is told that the matter will be dealt with formally, that his/her responses are also logged, and that this investigation is part of the official grievance procedure.

Source: ITUC (2008) Stopping Sexual harassment at work: A Trade Union Guide [http://www.ituc-csi.org/IMG/pdf/Harcelement\\_ENG\\_12pgs\\_BR.pdf](http://www.ituc-csi.org/IMG/pdf/Harcelement_ENG_12pgs_BR.pdf)

### 3. ETI / WIETA Sample sexual harassment policy (Klosters Brothers, South Africa)

*The following sample sexual harassment policy has been drawn up by the Ethical Tea Initiative (ETI) and the Wine and Agricultural Ethical Trade Association (WIETA) and is included in the training manual used by training managers and supervisors. Klosters Brothers is a fictitious company.*

Company X prohibits sexual harassment of its employees and applicants for employment by any employee, non-employee or applicant. Such conduct may result in disciplinary action up to and including dismissal.

This policy covers all employees. The company will not tolerate, condone or allow sexual harassment, whether engaged in by fellow employees, supervisors, or other non-employees who conduct business with the company.

Sexual harassment is any behaviour that includes unwelcome sexual advances and other verbal or physical conduct of a sexual nature when:

- submission to, or rejection of, such conduct is used as the basis for promotions or other employment decisions;
- the conduct unreasonably interferes with an individual's job performance or creates an intimidating, hostile or offensive work environment.

Company X employees are entitled to work in an environment free from sexual harassment and a hostile or offensive working environment. We recognize sexual harassment as unlawful discrimination, as is conduct that belittles or demeans any individual on the basis of race, religion, national origin, sexual preference, age, disability, or other similar characteristics or circumstances.

No manager or supervisor shall threaten or imply that an employee's refusal to submit to sexual advances will adversely affect that person's employment, compensation, advancement, assigned duties, or any other term or condition of employment or career development. Sexual joking, lewd pictures and any conduct that tends to make employees of one gender sex objects are prohibited.

Employees who have complaints of sexual harassment should (and are encouraged to) report such complaints to their supervisor. If this person is the cause of the offending conduct, the employee may report this matter directly to [specify various officials (e.g. Director of Human Resources, designated contact manager, etc)]. Your complaint will be promptly and thoroughly investigated. Confidentiality of reports and investigations of sexual harassment will be maintained to the greatest extent possible.

Any manager, supervisor or employee who, after appropriate investigation, is found to have engaged in sexual harassment of another employee will be subject to disciplinary action, up to and including dismissal.

If any party directly involved in a sexual harassment investigation is dissatisfied with the outcome or resolution, that individual has the right to appeal the decision. The dissatisfied party should submit his or her written comments to [specify official (e.g. Gender Committee, contact manager)].

The Company will not in any way retaliate against any individual who makes a report of sexual harassment nor permit any employee to do so. Retaliation is a serious violation of this sexual harassment policy and should be reported immediately. Any person found to have retaliated against another individual for reporting sexual harassment will be subject to appropriate disciplinary action, up to and including dismissal.

**Source:** ETI / WIETA Training Programme (provided with kind permission from ETI/WIETA)

## 4. Sample sexual harassment policy: ILO Pacific region

*The sample sexual harassment policy is intended for use by private and public employers in the Pacific to help them develop their own sexual harassment policies. It is based on international good practices and includes all the components which make a sexual harassment policy comprehensive.*

### Sample Sexual Harassment Policy

[Explanatory note: This sample sexual harassment policy is intended for use by private and public employers in the Pacific to help them develop their own sexual harassment policies. It is based on international good practices and includes all the components which make a sexual harassment policy comprehensive. As such, it is not intended to be a collection of clauses from which employers can pick and choose. Instead, any

effective policy must include most if not all of the content of this sample policy. Organisations should of course modify certain clauses to meet specific conditions within their organisations.]

## The Policy Statement

[Name of Company] is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. [Name of Company] will operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

[Explanatory note: This explains in broad terms what the policy is about and sets out the intention of the organisation in adopting the policy.]

## Definition of sexual harassment

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

### Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favours

### Verbal conduct

- Comments on a worker's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)
- Non-verbal conduct
- Leering
- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling

[Explanatory note: This section defines sexual harassment. If examples are included, it is important to note that they are not exhaustive and that sexual harassment can include any conduct of a sexual nature which is unwanted and unwelcome by the recipient.]

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. [name of company] recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

[Explanatory note: This recognises that men and women can be victims of sexual harassment in the workplace.]

[Name of company] recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of [company name], clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.

[Explanatory note: This section should be adapted to the needs of the company based on the type of work it does and the people who its employees are likely to come into contact with. Although it can be difficult for a company to deal with sexual harassment when it is perpetrated by third parties, the company is nonetheless responsible for the well-being of its workers if the harassment occurs during work. For example, companies where employees are in contact with third parties, such as hotels or restaurants, should have specific policies to deal with sexual harassment of its workers by customers.]

All sexual harassment is prohibited whether it takes place within [company name] premises or outside, including at social events, business trips, training sessions or conferences sponsored by [company name].

[Explanatory note: This recognises that harassment can take place both at the office, but also at social events where sexual harassment may be more likely to occur. This clause will vary according to the company and the type of work/activity they carry out.]

## Complaints procedures

[Explanatory note: Although complaints of sexual harassment can be dealt with through the normal company complaints procedure, companies are increasingly adopting specific complaints procedures to deal with sexual harassment to respond better to the needs of victims and to ensure that investigations are carried out properly. Individuals who deal with sexual harassment complaints should be trained specifically on this issue and on the nature of sexual harassment.

Further, victims of sexual harassment may want to resolve the matter in different ways. Some may be happy with an informal resolution and for the matter to stop, others may want more formal measures. In addition, informal resolution mechanisms may be inappropriate where the allegation is serious or where the harasser is also the victim's supervisor. It is important that the company's complaints procedures reflect these different needs and ways of resolving conflict.]

Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. [company name] recognises that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser.

If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.

When a designated person receives a complaint of sexual harassment, he/she will:

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands the company's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions
- respect the choice of the victim
- ensure that the victim knows that they can lodge the complaint outside of the company through the relevant country/legal framework

[Explanatory note: It is important to give the victim options for reporting the matter and this will depend on the structure of the company. The need for options for reporting is very important because having one person only to report to limits the ability of the victim to avail themselves of the complaints procedure. If for example, the harasser is also the designated person, the designated person is away on leave, or the victim would rather report it to a woman than a man or to a man than a woman and the designated person is a man, woman etc.]

Throughout the complaints procedure, a victim is entitled to be helped by a counsellor within the company. [company name] will nominate a number of counsellors and provide them with special training to enable them to assist victims of sexual harassment. [company name] recognises that because sexual harassment often occurs in unequal relationships within the workplace, victims often feel that they cannot come forward. [company name] understands the need to support victims in making complaints.

[Explanatory note: In many large companies, certain employees are designated as counsellors to help victims of sexual harassment navigate the complaints procedures.]

## Informal complaints mechanism

If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint to ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- ensure that a confidential record is kept of what happens
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped
- ensure that the above is done speedily and within [...] days of the complaint being made

## Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter.

The designated person who initially received the complaint will refer the matter to a senior human resources manager to instigate a formal investigation. The senior human resources manager may deal with the matter him/herself, refer the matter to an internal or external investigator or refer it to a committee of three others in accordance with this policy [Choose what options are most appropriate for the company].

The person carrying out the investigation will:

- interview the victim and the alleged harasser separately
- interview other relevant third parties separately
- decide whether or not the incident(s) of sexual harassment took place
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that the all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within [...] days of the complaint being made

[Explanatory note: Companies will need to create specific complaints mechanism to meet their needs. For instance a small company may not be able to have a panel of three decide on sexual harassment claims, and it may be more appropriate to have certain individuals trained in the company to investigate the complaints. If a committee is created to carry out the investigation, the committee should be set up bearing in mind gender-balance and could include, a representative of the company, a worker representative, etc. The Committee members, just as HR personnel or investigators dealing with sexual harassment, should be trained on understanding and deciding what constitutes sexual harassment, how to investigate it, etc.

It is also vital that the wishes and needs of the victim are incorporated into the outcome of the complaints mechanism. For example, if it is found that a victim was harassed by a colleague and that they work together on a daily basis, the views of the victim should be ascertained before making a decision on re-organising the office. For example, the victim may not want to be moved to a different department and as the victim, he/she should be entitled to decide this and not be re-victimised by being forced to move within the company.]

## Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the company. They can do so through [insert mechanism depending on country/legal framework – i.e. employment tribunal, ombudsperson, etc].

[Explanatory note: This section is intended to inform employees of their rights to use other national mechanisms that may be available to them. Some employees may not feel comfortable bringing a complaint through the disciplinary measures at work and they should be informed of their right to seek redress elsewhere. The internal policy of a company cannot prevent an employee from also using the national mechanisms available to him or her.]

## Sanctions and disciplinary measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- verbal or written warning
- adverse performance evaluation
- reduction in wages
- transfer
- demotion
- suspension
- dismissal

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

[Explanatory note: The policy should be applied consistently throughout the company and sanctions should be based on the gravity of the conduct. Suitable deterrent sanctions should be included in workplace policies on sexual harassment to ensure that incidences of sexual harassment are not treated as trivial events. They should become part and parcel of company regulations and/or collective labour agreements].

## Implementation of this policy

[Name of company] will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees must be trained on the content of this policy as part of their induction into the company.

Every year, [name of company] will require all employees to attend a refresher training course on the content of this policy.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

[Explanatory note: This creates an obligation on the company to ensure that all employees are aware of the policy.]

## Monitoring and evaluation

[company name] recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

[Explanatory note: Monitoring and evaluation can be done through different means, including questionnaires completed by employees, feedback from victims or those who work in the complaints procedure. This is important to review the effectiveness of the policy and the complaints procedure.]

For further information: <http://www.ilo.org/suva/>