PROTOCOL FOR THE PREVENTION, DETECTION AND RESPONSE TO SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, SEXUAL ORIENTATION OR GENDER EXPRESSION

ESDI - ESCOLA SUPERIOR DE DISSENY

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JUSTIFICATION

The prevention and treatment of harassment and sexual harassment are essential elements to guarantee the **well-being, dignity, equal opportunities, and safety** required by the educational community.

According to the **European Students' Union (ESU)**[1] and **UNESCO**[2], both leading organizations in the academic field, recognize that any unwanted sexual or harassing conduct that creates and offensive, intimidating, or humiliating environment negatively affects the personal development, emotional well-being, and academic performance of those affected.

ESDI – Escola Superior de Disseny, as a higher education institution, it acknowledges its commitment to ensuring **gender equality and zero-tolerance approach toward conduct that constitutes sexual harassment** or harassment based on sex, sexual orientation, and/or gender expression. This institutional commitment aims to guarantee a **safe, inclusive, and respectful environment**, free from any form of harassment – including **sexual harassment, harassment based on sex, sexual orientation, gender identity, or gender expression** – and to ensure that all members of the educational community can develop in conditions of dignity, equity, and protection.

Moreover, the principles established by the **European Union on equal treatment and non-discrimination**, together with the quality standards of the **European Higher Education Area (EHEA)**, highlight the need for higher education institutions to be equipped with **clear and effective mechanisms for preventing, detecting, and responding** to conduct that undermines coexistence, inclusion, and equal treatment within the university community.

The creation of this protocol is based on the guidelines established in the **Protocol guia d'àmbit universitari de 2022**[3] (2022 University-Level Protocol Guide), done by the Department of Equality and Feminisms and the Department of Research and Universities, as well as on current national and regional legislation and regulations. Its purpose is to provide ESDI, as an affiliated centre of **Ramon Llull University**, with its own framework for action, adapted to its structure, institutional culture, and academic scope.

[1] European Students' Union. (2024). *Student Rights Charter*. https://esu-online.org/wp-content/uploads/2024/06/Student-Rights-Charter.docs_.pdf

[2] UNESCO; UN Women. (2016). *Global guidance on addressing school-related gender-based violence*. UNESCO. https://doi.org/10.54675/VFOP6248

[3] Generalitat de Catalunya. (2023). *Protocol guia d'àmbit universitari per prevenir i reparar amb diligència deguda les situacions de violència masclista, assetjament sexual i assetjament per raó de sexe, orientació sexual, identitat de gènere o expressió de gènere*. Departament d'Igualtat i Feminismes. https://igualtat.gencat.cat/web/.content/Ambits/violencies-masclistes/NOVA-ESTRUCTURA/Protocols/Protocol-guia-dambit-universitari.pdf

AIM OF THE PROTOCOL

The present Protocol for the prevention, detection, and response to sexual harassment and harassment based on sex, sexual orientation, or gender expression has the following purposes:

1. To serve as an **instrument for preventing sexual harassment**, harassment based on sex, sexual orientation, gender identity, or gender expression, as well as acts of gender-based violence.

2. **To promote a culture of prevention, information, and awareness** regarding harassment and gender-based violence within the educational community, fostering a safe, respectful, and inclusive academic environment.

3. **To establish clear mechanisms and guidelines for action and communication** in cases of harassment, enabling a swift, responsible, and respectful response toward the affected person and their environment.

4. To ensure that any detected situation is addressed in a way that **protects the dignity** of the individuals involved, maintains **confidentiality**, and respects the **terms** established in the corresponding procedures.

5. **To establish procedures and resources for assistance, support, and reparation** aimed at guaranteeing the well-being, protection, and restoration of the rights of individuals affected by harassment.

6. **To contribute to the destigmatization of situations of harassment** and gender-based violence, encouraging affected individuals to seek support and accompaniment, integrating this into a safe, responsible, and respectful educational culture.

GUIDING PRINCIPLES

This harassment Protocol is based on the following principles:

- **Principle of due diligence:** The procedure must be handled with the greatest possible speed, without undue delays, adopting, where appropriate, the necessary provisional or precautionary measures according to the circumstances of each case, with full respect for the rights of all parties involved and guaranteeing non-repetition and non-revictimization.
- **Principle of gender and intersectional perspective:** The application and interpretation of the Protocol will incorporate an understanding of structural gender inequalities and other factors of multiple discrimination, to ensure an appropriate and effective response.
- **Principle of equal treatment and non-discrimination:** Any discrimination on the grounds of sex, sexual orientation, gender identity or expression, origin, religion, opinion, or any other personal or social condition is prohibited, in accordance with current legislation.
- **Principle of protection of privacy and dignity:** The procedure will be conducted with due discretion, preserving the privacy, dignity, and confidentiality of the affected persons and of those reported, and guaranteeing support and accompaniment throughout all phases of the process.
- **Principle of hearing, defence, and impartiality:** The right to be heard and to defend oneself will be guaranteed for all persons involved, as well as the impartiality of the actions, which will be carried out in good faith with the aim of clarifying the facts.
- **Principle of prevention and prohibition of retaliation:** Protection will be ensured against any form of retaliation or second-order violence towards complainants, witnesses, or those who provide support to affected persons.
- **Principle of voluntariness:** Activation of the Protocol and access to other avenues of action will respect the autonomy and will of the affected person, without prejudice to any legal obligations that may apply.
- **Principles of effectiveness, coordination, and specialization:** Actions will be carried out in a coordinated manner between the competent bodies, with properly trained and specialized staff.
- **Principle of confidentiality:** All information and documentation arising from the application of the Protocol will be treated as confidential and handled in accordance with current data protection regulations.

SCOPE AND NATURE OF THE PROTOCOLO

1. SCOPE OF APPLICATION

1.1. Objective Scope

The objective scope refers to the types of conduct covered by this Protocol.

This Protocol applies to all conduct involving sexual harassment, sex-based harassment, harassment related to gender expression, or harassment based on sexual orientation, whether expressed verbally, physically, and/or through digital means (email, social media, SMS, WhatsApp, etc.).

1.2. Subjective Scope

The subjective scope determines to whom this Protocol applies.

This Protocol applies to **the entire educational community of ESDI – Escola Superior de Disseny**, regardless of academic, contractual, or functional affiliation. It includes:

- **Students** enrolled in all undergraduate, master's, vocational, or other academic programs offered by ESDI.
- **Teaching staff**, including permanent faculty, adjunct instructors, and visiting lecturers.
- **Administrative, technical, and service staff** of the institution.
- **Other individuals temporarily linked to ESDI**, such as interns, researchers, or participants in collaborative projects, provided that the risk situation occurs within the context of institutional activities or spaces.

1.3. Territorial Scope

This Protocol applies:

- **Within ESDI facilities** (classrooms, workshops, common areas, cafeteria, etc.). For the purposes of this Protocol, all spaces where academic, training, or institutional activities take place are considered part of ESDI.
- **Outside ESDI facilities**, when the conduct occurs in the context of an academic or professional activity organized by ESDI or third parties (conferences, trips, mobility

programs, external internships, participation in external events, etc.), as well as during travel to and from ESDI.

1.4. Temporal Scope

This Protocol applies for as long as the individuals involved maintain a connection with ESDI (fall within its objective scope), regardless of whether the relationship is permanent, regular, or occasional.

Likewise, the Protocol may be applied when the events have not expired under applicable legislation, even if the individuals involved are no longer affiliated with ESDI (e.g., end of contract, completion of studies).

2. SCOPE AND NATURE

This document is preventive, guiding, and designed for immediate intervention in situations of harassment. It constitutes an institutional framework for action and referral, enabling the activation of appropriate mechanisms to prevent, detect, and address potential harassment, while ensuring the protection, safety, and support of the affected person.

The Protocol does **not** replace the responsibilities of emergency services, healthcare providers, public health authorities, or judicial or administrative bodies. Instead, it complements their work by ensuring an orderly, coordinated, and respectful initial response within the educational environment.

3. DEFINITIONS OF SITUATIONS AND CONDUCT

In accordance with the Protocol for the Prevention, Detection and Action Against Sexual Harassment, Sex-Based Harassment, Sexual Orientation Harassment or Gender Expression Harassment of Ramon Llull University[4], and based on the behaviours defined in Law 5/2008 of 24 April on the Right of Women to Eradicate Gender-Based Violence (as amended by Law 17/2020 of 22 December), this Protocol is activated in response to any of the following forms of gender-based or LGBTI-phobic violence:

- Gender-based violence: A violation of human rights expressed through violence against women as a manifestation of discrimination and inequality within a system of power relations of men over women. This violence—whether physical, economic, or psychological, including threats, intimidation, and coercion—results in physical, sexual, or psychological harm or suffering, whether in public or private spheres.

- LGBTI-phobic violence: Any attitude, behaviour, or discourse of rejection, contempt, prejudice, discrimination, or intolerance toward LGBTI individuals because of who they are, or because they are perceived as such.

3.1. Gender-based violence

Regarding gender-based violence, it may be exercised either as an isolated act or repeatedly in any of the following forms:

- **Physical violence:** includes any act of force against a woman's body that results in, or carries the risk of causing, physical injury or harm.
- **Psychological violence:** includes any behaviour or omission that causes a woman devaluation or suffering through threats, humiliation, degrading treatment, belittlement, contempt, demands for obedience or submission, verbal coercion, insults, isolation, or any other restriction of her freedom. Gender-based violence may also be carried out through threats or the infliction of physical or psychological violence against the woman's emotional environment—especially her sons and daughters or other relatives who live with her or have a direct relationship with her—when the purpose is to cause her distress. It also includes **environmental violence**, which consists of acts of violence against the woman's belongings or property, whether of economic or sentimental value, or against animals with whom she has an emotional bond, with the intention of distressing her or creating an intimidating environment.

[4] Ramon Llull University . (2024). *Protocol de prevenció, detecció i actuació contra l'assetjament sexual, per raó de sexe, d'orientació sexual o d'expressió de gènere* (PDF). Universitat Ramon Llull. https://www.url.edu/sites/default/files/content/file/2024/07/01/36/pr_assetjament_url_2024_cat.pdf

- **Sexual violence:** includes any act that violates a woman's sexual freedom and personal dignity by creating conditions or taking advantage of a context that directly or indirectly imposes a sexual act without the woman's consent or will, regardless of the relationship between the woman and the aggressor(s). It includes bodily access, female genital mutilation or the risk of undergoing it, forced marriages, trafficking of women for sexual exploitation, sexual harassment and sex-based harassment, sexual threats, exhibitionism, voyeurism, and the imposition of any sexual practice, among other behaviours.
- **Digital violence:** consists of acts of gender-based violence and online misogyny that are committed, instigated, amplified, or aggravated, in whole or in part, using information and communication technologies, social media platforms, websites or forums, email, instant messaging systems, and similar means that affect the dignity and rights of women. These acts cause psychological and even physical harm; reinforce stereotypes; damage dignity and reputation; violate a woman's privacy and autonomy; cause economic losses; and hinder her political participation and freedom of expression.

3.2. Types of harassment

Within the academic and workplace environment, different forms of harassment may occur:

- **Sex-based harassment:** unwanted verbal or physical conduct related to a person's sex or gender that undermines their dignity or their academic or working conditions, creating an intimidating, hostile, or humiliating environment. This includes discriminatory attitudes, belittlement, insults, or sexist humour.
- **Sexual harassment:** any unwanted verbal, non-verbal, or physical behaviour of a sexual nature that violates a person's dignity or freedom or creates an offensive or intimidating environment, including comments, insinuations, non-consensual physical contact, or sexual coercion. Sexual harassment may include:
    - Spreading rumours, asking about, or sharing details of someone's sexual life.
    - Making offensive sexual comments or jokes.
    - Making crude remarks about someone's body or physical appearance.
    - Pressuring someone to arrange compromising dates or to participate in unwanted social activities.
    - Staring lasciviously at someone's body or making obscene gestures.
    - Requesting sexual favours.
    - Excessive physical proximity or imposing unwanted physical contact.
    - Creating unnecessary situations of isolation with the person.
    - Forcing the harassed person to choose between complying with sexual demands or losing certain benefits or conditions (sexual coercion).
- **Harassment based on sexual orientation, gender identity, or gender expression:** behaviours motivated by these factors that undermine a person's dignity or physical or psychological integrity and create a hostile or degrading environment.

These behaviours may occur as **isolated incidents or repeatedly** and may arise in **horizontal or vertical relationships**. Although they primarily affect women, individuals of any sex or gender may experience them.

- **Horizontal harassment:** between peers or colleagues.

- **Vertical harassment:**

- Downward vertical: from a superior to a subordinate, from a teacher to a student…
- Upward vertical: from a subordinate to a superior, from a student to a teacher…

Second-order violence is also recognized, referring to violence directed at individuals who support victims, through retaliation, humiliation, or persecution, which hinders the prevention, detection, and response to gender-based violence.

4. RIGHTS AND OBLIGATIONS OF THE PARTIES INVOLVED

The following rights are guaranteed to both complainants and respondents within the framework of this Protocol:

4.1. Rights of the complainant(s)

1) To be summoned and heard under conditions that avoid revictimization.

2) To be accompanied by a trusted person and, if desired, by legal counsel and/or an interpreter.

3) To receive continuous information about the progress of all phases of the procedure.

4) To be notified of any provisional or precautionary measures adopted to prevent the recurrence of the conduct.

5) To receive information regarding the final resolution of the case.

6) To access psychological support and other accompaniment measures that ensure their protection and well-being.

4.2. Rights of the respondent(s)

1) To be informed of the complaint filed against them and to be summoned and heard.

2) To have the presumption of innocence respected throughout the entire procedure.

3) To be accompanied by a trusted person, legal counsel and/or social representatives, as well as an interpreter if necessary.

4) To be notified of any provisional or precautionary measures adopted in relation to the protection of the complainant or the procedure.

5) To receive information regarding the final resolution of the case.

6) To present any legally admissible evidence that may support their position and defence.

4.3. Duties and obligations of FUNDIT Management

1) To guarantee an educational and work environment that prevents the occurrence of behaviours constituting harassment.

2) To disseminate this Protocol to the entire educational community through the appropriate internal channels.

3) To avoid any omission in response to alleged conduct of sexual harassment, sex-based harassment, harassment based on sexual orientation, gender identity, or gender expression, activating the procedures established in this Protocol when necessary.

4) To apply, where appropriate, the corresponding disciplinary measures in accordance with current regulations.

5) To prepare and maintain an anonymous internal register that collects relevant data, including the number of complaints, reports, resolutions, the profile of individuals who activated the Protocol, and other pertinent elements.

6) To update this Protocol whenever circumstances or current regulations require it.

4.4. Duties and obligations of the ESDI, EFPA, and EATM community

All members of the educational community—administrative and service staff (PAS), teaching and research staff (PDI), students, external collaborators, and other affiliated individuals—have the following responsibilities:

1) To carry out their academic or professional activity in an environment free from discrimination and harassment.

2) To treat all members of the educational community with respect, fostering coexistence and collaboration.

3) To report any situation of harassment they become aware of, strictly following the procedures established in this Protocol, with maximum discretion and confidentiality.

4) To collaborate, when requested, in the investigation of possible harassment cases, providing information or evidence during the different phases of the procedure.

PREVENTION STRATEGIES AND ACTION PLAN

5. PREVENTION STRATEGIES

In accordance with current legislation, prevention consists of a set of actions aimed at avoiding or reducing the incidence of behaviours that constitute harassment and gender-based violence by reducing risk factors, preventing the normalization of such behaviours, and raising awareness within the community so that no form of violence or harassment is justified or tolerated. This definition aligns with the principles and objectives of **Law 5/2008, of 24 April, on the Right of Women to Eradicate Gender-Based Violence**, as amended by **Law 17/2020, of 22 December**, which expands and strengthens protection, prevention, and the inclusion of contemporary forms of violence, including digital violence and the intersectional perspective in the comprehensive approach to gender-based violence.

Examples of preventive actions promoted by FUNDIT to ensure a safe university environment free from harassment include:

5.1. Dissemination Actions

- Development and implementation of a Communication Plan for the Protocol, disseminated to the entire educational community through internal channels: institutional website, virtual campus, staff intranet, corporate email, student representation forums, and labour unions or staff representatives.

- Inclusion of the Protocol in onboarding materials for new teaching and administrative staff (**PDI and PAS**), with delivery of the document and signature of a responsibility statement upon contract formalization.

- Delivery of the Protocol to newly enrolled students and signature of a responsibility statement at the time of enrolment.

- Dissemination of FUNDIT's Ethical Code and the Student Rights and Duties Regulations.

5.2. Awareness-Raising Actions

- Organization of talks, seminars, and debates on harassment prevention and gender equality.

- Information and awareness campaigns promoting respectful and non-discriminatory behaviour.

- Commemorative events on dates related to the fight against gender-based violence and harassment.

5.3. Training Actions

- Integration of training activities on harassment prevention, gender equality, and respect for diversity into the annual institutional training plan.

- Inclusion of gender perspective and respectful coexistence principles in academic programs and training activities.

5.4. Context-Specific Actions

These measures aim to reduce risk factors that may facilitate harassment in specific situations, and may include, among others:

- Conducting tutorials and exam reviews **with open doors and in designated spaces within the institution**, avoiding isolated or vulnerable situations.

- Exclusive use of the **institution's corporate email** for all official communications with students, avoiding personal messaging apps or social media for academic or professional matters.

- Mandatory **communication** by teaching staff (**PDI**) to Academic Management of any consensual romantic or sexual relationship with a student under their instruction, supervision, or tutoring, to reorganize teaching duties and prevent conflicts of interest or potential abuse of power.

6. ACTION PLAN

Situations of harassment that fall within the scope of this Protocol may be addressed through two internal pathways:

6.1. Type of procedures

a) **Informal procedure:** initiated through an internal complaint, with the aim of achieving a swift and confidential resolution, facilitating mediation or other preliminary measures when appropriate.
b) **Formal procedure:** initiated through an internal report submitted to the competent body responsible for investigating and resolving the case.

Both procedures may be activated by:

- The person who has experienced the conduct (the affected person).
- Any member of the ESDI, EFPA, or EATM community who has direct or indirect knowledge of the situation.

If the person submitting the complaint or report is not the affected person, **informed consent from the affected person is required to initiate the corresponding procedure.**

Initiating one procedure does not prevent activation of the other at any time, depending on the affected person's decision and the nature of the reported facts.

6.2. Preliminary Guidance and Explanation of Available Pathways

To help the interested person understand the available options, preliminary guidance and information about the most appropriate procedure may be provided by the **Equality and Harassment Reference Person** (or the person responsible for quality and legal services) at ESDI.

This person is responsible for:

1) **Informing** the individual about the definitions of conduct covered by the Protocol and determining whether, based on the evidence provided, the situation may constitute sexual harassment, sex-based harassment, harassment based on sexual orientation, or gender expression.

2) **Explaining verbally or in writing** the two internal procedures (informal and formal), helping the individual identify the most appropriate pathway.

3) **Informing all parties of their rights, duties, and guarantees**.

4) **Advising and accompanying** the affected person in submitting the internal complaint or report, if desired.

5) When, based on the description of the facts, the reference person considers it appropriate to adopt a **precautionary or provisional measure**, they shall submit a **reasoned proposal to the General Management of FUNDIT**, who will decide on the adoption of the specific measure or measures.

This preliminary guidance is **voluntary**. The person may choose to **submit a complaint or report directly without requesting prior guidance**.

6.3. Precautionary Measures and Protection of the Affected Person

At any point after the situation is reported—regardless of the chosen procedure—**provisional or precautionary measures** may be adopted to protect the affected person, prevent recurrence, and ensure the physical and psychological integrity of all parties, applying a gender perspective and respecting everyone's rights.

7. PROCEDURE PHASES

7.1. Informal Procedure – Complain

Phase 1: Filing the grievance[5]

- The affected person or any member of the community with knowledge of the situation may file a **written grievance** to the Quality Manager, either in person or via email at **qualitat@esdi.edu.es**.

Phase 2: Intake and initial information

- The Quality Manager summons the person who filed the grievance to present the facts and **informs them of their rights, duties, and the informal procedure**, if this has not been previously done during the counselling phase.

Phase 3: Preliminary analysis

- Within **14 calendar days** from the filing of the grievance, the Quality Manager will prepare a **preliminary report including relevant facts and an initial assessment of the situation**. This 14-day period is a recommendation from the URL for preliminary reports in grievance and complaint circuits.

- The investigation must be carried out with **speed and without undue delay**, guaranteeing confidentiality and avoiding re-victimization.

Phase 4: Decision on the path to follow

The preliminary report proposes one of the following options:

- Continue with the **informal procedure** if it is considered that the situation can be addressed through mediation measures or other preventive or corrective actions.

- Refer the situation to the **formal procedure** if the facts so require or if the affected person requests it.

7.2. Formal Procedure – Complain

Phase 1: Filing the complaint[6]

[5] The institution has a *Purple Point* (Punt Lila), available at https://www.puntlilaesdi.com/alerta. If the communication is received through this channel, it will be forwarded to the person responsible for Quality and Legal Services.

[6] Annex I of this Protocol includes the complaint form that must be submitted.

- The complaint must be filed with the Quality Manager, in person or by email (**qualitat@esdi.edu.es**). The complaint must include all relevant information regarding the facts.

Phase 2: Verification of the complaint and constitution of the Commission

- Within a maximum period of **7 working days** from filing, the responsible person verifies that the complaint contains the minimum required information and convenes an **ad hoc Investigation Commission**. Members will sign confidentiality agreements and recuse themselves in case of a conflict of interest.

Phase 3: Investigation proceedings

The Investigation Commission carries out, in a rigorous and objective manner:

- Analysis of the complaint and available documentation.
- Notification to the respondent, unless this implies a risk of destruction of evidence.
- Separate interviews with the complainant, the respondent, and potential witnesses.
- Collection of evidence and documentation.
- Assessment of the adoption of **provisional precautionary measures** if necessary.

  These actions are carried out with **diligence and gender and non-discrimination perspectives**, recommending that the final report be issued within approximately 20 working days from the constitution of the Commission.

Fase 4: Investigation report and proposed resolution[7]

The Commission drafts a **binding report** including:

- A summary of the proven facts.
- Evaluation of evidence.
- A reasoned proposal for resolution, which may include:
  - Initiation of disciplinary proceedings with corrective/protective measures.
  - Archiving of the complaint if harassment is not proven.
  - Proposal to open proceedings if there are signs of falsehood.

[7] The minimum content of this report is detailed in Annex II of this Protocol.

- Transfer of information to the **Public Prosecutor's Office** if the facts may constitute a crime.

Fase 5: Resolution and notification

- The Commission submits the report to the FUNDIT General Management, which issues the **final resolution**. This resolution is communicated to all parties involved, indicating the corresponding rights of appeal.

Fase 6: Post-resolution follow

- It is the responsibility of the Commission or the Quality Manager to **monitor compliance with the measures adopted** and verify the evolution of the situation to guarantee non-repetition.

7.3. Custody and records

All documentation generated during the procedure must be kept with strict **confidentiality**. The person responsible for quality and legal services will manage the registry and safeguard the documents, in accordance with data protection regulations and university document management criteria.

In this context, they will prepare an annual **Protocol Monitoring and Evaluation Report**, which will include the indicators from the database[8] they manage number of grievances, complaints, resolutions, typology of persons who have activated the Protocol (PAS, PDI, students), or other elements considered relevant.

Where appropriate, they will propose improvement suggestions if needs for improvement have been detected, for example, derived from the activation of the protocol.

[8] This database is anonymous in nature and is the place where the number of complaints, reports, resolutions, the type of individuals who have activated the Protocol (administrative and service staff, teaching and research staff, students), and any other elements considered relevant will be recorded.

ANNEX I: INTERNAL COMPLAINT FORM

Details of the complainant

Name and surname	
ID / NIE / Passport	
Email address	
Contact phone number	
Identification (Group)	1. Teaching and Research Staff (specify institution, department, unit...) 2. Administrative and Services Staff (specify institution, department, unit, or service): 3. Student (specify degree and institution): 4. Others (specify)

Description of the events that occurred

Identifying data of the persons involved	1. Full name: 2. Position or affiliation with FUNDIT, ESDI, EFPA, EATM: 3. Contact details (if known):
Place and date where the events occurred	
Description of the facts	(attach relevant documentation as appropriate: witness statements, evidence: emails, screenshots, recordings, etc.)
Observations	

I, _____, with ID / NIE / Passport _____, hereby file this internal report and grant my consent for the activation of the institution's *Protocol for the prevention, detection, and action against sexual harassment and harassment based on sex, sexual orientation, or gender expression.*

_____ (place), ___ (day) of _____ (month), 202__.

Signature

ANNEX II: MINIMUM CONTENT OF THE INVESTIGATION COMMISSION REPORT

Following the guidelines of the Commission for Equality and Working Time of the Labour Relations Council of Catalonia, as set out in the Guide for the development of the protocol for the prevention and management of sexual harassment and harassment based on sex in the workplace:

"The report must include, at a minimum, the following information:

- *Identification of the person(s) allegedly harassed and the alleged harasser(s).*
- *Nominal list of the individuals who participated in the investigation and the drafting of the report.*
- *Case background, report/complaint, and circumstances.*
- *Other actions: evidence, summary of the main facts, and actions taken. When witness interviews have been conducted, and to ensure confidentiality, the summary of this action must not indicate who made the statement, but only whether the reality of the investigated facts is confirmed.*
- *Observed aggravating circumstances:*
    - *Whether the respondent is a repeat offender in committing acts of harassment.*
    - *Whether there are two or more harassed persons.*
    - *Whether intimidating behaviour or reprisals by the harasser are proven.*
    - *Whether the harasser has decision-making power regarding the professional relationship of the harassed person.*
    - *Whether the harassed person has any type of disability.*
    - *Whether the physical or psychological state of the harassed person has suffered serious alterations, certified by medical personnel.*
    - *Whether pressure or coercion is exerted on the harassed person, witnesses, or people in their professional or family environment, with the intent to avoid or hinder the ongoing investigation.*
- *Conclusions.*
- *Corrective measures."*