

The Principles of Safe and Respectful Cooperation: Counteracting Sexualised Harassment

The document was prepared by Legal Initiative in cooperation with Nasta Bazar and the civil society of Belarus



Hello!

What you see here is the final version of the document “The Principles of Safe and Respectful Cooperation”. It is created for communities, initiatives, and organisations to have a clear, honest, and coordinated set of norms that helps maintain a safe environment and reduce the risk of sexualised harassment.

The document can be used in different ways: as a foundation of internal policy, a point of reference for new members, a part of the code of conduct, a public declaration of values, or as a threshold for collaborations. It suits both formal structures and informal groups, where it is important to agree on communication rules and responsibilities beforehand.

We are intentionally using gender-sensitive and gender-neutral language. This way of writing helps avoid categorizing a person into a single gender category and does not exclude non-binary and gender-diverse people.

Important to clarify: when the word “women” is used in the text, it is not because we want to limit the topic, but because it is women who most often face sexualised harassment from men — this claim is backed both by international research and the experience of Belarusian communities.

That said, we do not just mean women. Non-binary and trans people, cis men, and other community members all go through sexualised harassment and boundary violations in clashes of power and vulnerability. These principles include everyone, regardless of gender.

This document is a result of collaboration between many participants and experts. People shared experiences, commented on the wording, and helped make the text relevant, human, and applicable in real-life situations. We hope it becomes a valuable tool for those seeking to build cooperation grounded in respect, transparency, and safety.

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Introduction

This document has been created in response to the systemic issue of sexualised harassment in Belarusian civil society, including diaspora organisations and initiatives. Sexualised violence, including harassment, is not an exception, but a symptom of structural inequality and power. Silence, covering up, lack of response mechanisms, as well as the fear of being "inconvenient," "too emotional," or "undermining trust in civil society" — all contribute to the replication of violence even in the most progressive communities.

We are convinced that fostering a safe and respectful environment is not an add-on to activism, but its very foundation. Combating violence is impossible without recognising the vulnerabilities within our communities and a willingness to act. Therefore, this document does not present a universal truth, but a set of principles, tools, and practices that can help Belarusian civil society organisations (both those operating within the country and abroad) recognise and prevent harassment, support survivors, and address the consequences.

The objective of this document is to promote a culture of zero tolerance for sexualised violence and harassment. This is only possible through collective responsibility, willingness to learn, and commitment to transformation.

We offer framework principles, practical recommendations, examples, and models grounded in local context, research, international practices, and survivors' experiences. This document can serve as a basis for internal organisational policy, a declaration of intent, training and reference material, and, most importantly, an invitation to an honest, difficult, but necessary conversation.

How to use this document:

It is recommended to use this document as the basis for internal policy and code of conduct, which will be mandatory for all employees: it can be an official declaration of zero tolerance for harassment in the organisation.

All employees are advised to get familiar with its provisions and, if necessary, refer to it in situations related to ethical standards and corporate culture.

The framework principles facilitate the development of mechanisms for prevention, response, and accountability. They serve as the benchmark for staff training, ensuring that the principles of zero tolerance for harassment are understood and applied in practice.

Definitions

This section aims to establish a common language to facilitate effective conversations about violence, misconduct, accountability, and boundaries. The terms have been selected with feminist, human rights, and transformative approaches in mind. Their purpose is not legal formalisation, but rather the creation of a clear and supportive context.

- **Sexualised violence** — any acts of a sexualised nature committed against a person's will, including rape, sexualised coercion, sexual harassment, exploitation, or violent sexualised acts in the context of domestic violence. Sexualised violence primarily reflects the perpetrator's intent to dominate, control, and violate another person's boundaries.
- **Sexualised harassment** — any unwanted acts of a sexualised nature (verbal, nonverbal, or physical) that have the purpose of, or result in, violating a person's dignity, especially when they create an intimidating, hostile, humiliating, or offensive environment.

By sexualised behaviour, we mean words, actions, or gestures that contain sexualised subtext, hint, or connotation, and are directed at another person's body, sexuality, or intimacy.

Such behaviours may include, among other things:

- persistent or inappropriate comments about a person's body, appearance, sexuality;
 - “jokes” and hints of a sexualised nature;
 - looks, gestures, or facial expressions with a sexualised subtext;
 - invasion of personal space;
 - unwanted touches or attempts at contact;
 - sending messages, audio, video, or images of sexualised content without consent;
 - any other actions that cause a person discomfort, humiliation, fear, or a feeling of insecurity.
- **Survivor** — any acts of a sexualised nature committed against a person's will, including rape, sexualised coercion, sexualised harassment, exploitation, or violent sexualised acts in the context of domestic violence. Sexualised violence primarily reflects the perpetrator's intent to dominate, control, and violate another person's boundaries.

- **Harasser / Boundary violator** — a person whose behaviour, actions, and/or words have led to situations of sexualised harassment. The goal of the document is not to criminalise, but to focus on how society can acknowledge, discuss, and transform behaviour that violates boundaries.
- **Consent** — voluntary, informed, active, and revocable “yes”. Lack of resistance or silence does not constitute consent. Consent can be revoked at any time. It is vital to consider hierarchy, dependency, vulnerability, and the degree of freedom while consent is expressed. In situations involving pressure, fear of losing employment, status, support, or group affiliation, consent cannot be considered free. Such “consent” is inherently unfree and unwanted, and should be viewed as a manifestation of sexualised harassment.
- **Hierarchy and subordination** — relationships in which one person is dependent on another, for example, based on age, experience, status, or role within the organisation. Harassment often occurs in these contexts because one party has more power, while the other has less ability to say “no”.
- **Flirting** — voluntary, reciprocal expression of affection between individuals. Flirting, as is, does not constitute harassment: in the workplace, personal relationships and mutual romantic expressions with both individuals’ consent are not considered inappropriate. However, even flirting can turn into harassment if one party stops consenting to it or begins to feel uncomfortable¹. It is important to consider a potential power imbalance if there is a difference in status, authority, or subordination between the participants (e.g., a manager and a subordinate). In such situations, consent may be unfree or formal, and one party's initiative may be perceived as pressure.
- **Retaliation (persecution of those who reported harassment)** — punishment, threat of punishment, or other adverse treatment directed at a person who reported an incident of harassment, filed a complaint, participated in an investigation, supported the survivor, or testified. Retaliation may take the form of pressure, intimidation, demotion, refusal to participate in projects, public discreditation, or social alienation^{2,3}.

¹ page 22 Prevention of sexual harassment and persecution based on sex/gender in the police force

² Sexism and harassment at the workplace: how to protect yourself? – Manshuq

³ page 28 Conceptual framework of the system of measures for combatting discrimination and achieving equality in Belarus

- **Dick pic** (derived from dick, slang for penis, and pic, short for picture) — photograph of a penis, that is sent to another person without their consent. In many countries' law, sending such explicit images against the recipient's will is considered a criminally offensive form of sexualised harassment⁴.
- **Nudes** — photographs of an intimate nature (often of the naked body)⁵.
- **Victim blaming** — shifting responsibility for the harassment onto the survivor, not the harasser, i.e., blaming the survivor for what happened⁶. Victim blaming can manifest in words or actions — for example, through comments like "It's their own fault for going there", "Why did they provoke that person", "The skirt was too short", "They could have said no", or "It was just a misunderstanding". In professional or activist settings, it can also take institutional forms: refusing to join a complaint, publicly doubting the survivor's words, or pressuring them "not to air dirty laundry". Such behaviour enhances trauma, undermines trust, and hinders the fostering of a safe environment. It is important to remember that responsibility for harassment always lies with the perpetrator, not the survivor.
- **Community** — a group of people tied together by a shared activity, values, and/or purpose, within which regular interactions and joint initiatives occur. A community can be either an organisation or an informal network, and is jointly responsible for creating a safe and respectful environment for organisational work and interaction. Such associations can exist both offline and online.
- **Transitional justice** (transformative approaches to conflict resolution) — responding to violence approach that rejects repressive models and focuses on changing structures, restoring justice, supporting survivors, and engaging the perpetrator in a process of awareness and transformation⁷.
- **Confidentiality** — restricting access to personal data to everyone, besides a limited number of authorised individuals; in the EU, this is also a legal obligation in information channels⁸.

⁴ Alexandra Tweten: Bye Felipe: Disses, Dick Pics, and Other Delights of Modern Dating

⁵ Anastasiya Arsenyeva, Anna Morozova: Manifestations of gender discrimination to women in publications of the online resource "Yandex Zen" DOI: 10.24411/2070-0717-2020-10223

⁶ The dictionary of feminist terms – RFA "ONA"

⁷ What is Transitional Justice?

⁸ page 16 DIRECTIVE (EU) 2019/1937 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2019 on the protection of persons who report breaches of Union law

Framework principles

Framework principles are fundamental guidelines that underpin an organisation's or community's policies on safe, respectful, and ethical interactions. They are not step-by-step instructions, but rather the foundation on which specific decisions, procedures, and daily practices depend. These principles help set the tone for internal culture, prevent boundary violations, mitigate the risks of discrimination and violence, and foster a sustainable environment of trust and equality.

In this section, we will divide the framework principles into two levels:

- general, mandatory and relevant for organisations of any speciality and size;
- specific, tailored to organisations of various sizes — from small initiatives to structured teams.

This differentiation allows us to consider the actual capabilities, needs, and risks in different contexts. Regardless of the work's form or format, the framework's principles establish an ethical standard and serve as the basis for an internal zero-tolerance policy for harassment.

General principles (common for all organisations)

A safe and respectful work environment is built on a set of universal principles applicable to organisations of any speciality and size. The primary goal is to create an environment in which every participant feels protected, valued, and respected, and has the opportunity to freely express opinions and ideas without fear of punishment or humiliation. This principle of psychological safety means that people are confident they will not be ridiculed or punished for expressing ideas, asking questions, or making mistakes. Research shows that employees who feel respected and valued at work are more engaged and productive⁹. Described below are the key general principles that should underpin a culture of safe and respectful cooperation:

- 1 Respect and equal dignity.**

Every team member, regardless of their position or status, should feel respected and maintain their dignity. This includes polite communication, appropriate criticism, and recognition of each person's contribution. Particular emphasis is placed on the unacceptability of any manifestations of disrespect or arrogance. For example, the World Intellectual Property Organisation (WIPO) guidelines state that all employees must demonstrate mutual respect and courtesy toward one another and everyone they interact with, without making distinctions based on gender, race, age, religion, sexual orientation, status, etc.¹⁰ This principle of universal equality means that the organisation respects everyone's right to dignity, privacy, integrity, and equal treatment.
- 2 Zero tolerance toward discrimination and harassment.**

A safe environment is impossible to create if discriminatory actions, bullying, and harassment are tolerated. An organisation must declare zero tolerance for discrimination, harassment, and violence in any form. Codes of conduct explicitly affirm a commitment to ensuring a work environment free of hostility, harassment, and injustice¹¹. Such codes typically describe unacceptable forms of behaviour and establish complaint and accountability mechanisms. For example, the the International Limited Partners Association (ILPA)¹² recommends that

⁹ page 7 Psychological Safety and Learning Behaviour in Work Teams

¹⁰ page 5 Guide to a respectful and harmonious workplace

¹¹ page 2 CODE OF CONDUCT: HARASSMENT, DISCRIMINATION AND WORKPLACE VIOLENCE

¹² Institutional Limited Partners Association – trade association. <https://ilpa.org/>

an organisation include an explicit commitment in its code to maintaining a safe, respectful work environment free of harmful behaviour. Every employee must know that no form of harassment, bullying, or humiliation will be tolerated.

3 Openness, inclusivity, and equal involvement.

A culture of respectful cooperation encourages open communication and participation from all team members. It's essential to create an environment where everyone feels heard and their opinions are considered. This is achieved through encouraging the exchange of ideas, collaborative discussion of problems, and involving employees in decision-making whenever possible. An organisation operating according to democratic principles ensures that everyone has a say and that leaders listen to feedback. As noted in NPO guidelines, if the management fails to facilitate dialogue with the team and does not involve employees in decision-making, the organisation risks slipping into an undemocratic style, leading to employee dissatisfaction¹³. Therefore, openness encompasses transparent information sharing, regular team discussions, and leaders' willingness to consider colleagues' perspectives. Furthermore, inclusivity means valuing diversity — cultural, gender, and professional — and creating an environment where different points of view are seen as assets rather than obstacles. In a healthy team, even when disagreements arise, everyone is expected to share their opinions and to treat others with due consideration. This practice of respectful listening teaches us to recognise that a different point of view is understandable and deserves respect.

4 Trust and psychological safety.

Respectful cooperation is unthinkable without an atmosphere of trust. Trust manifests when people feel confident in their colleagues' support, and can be vulnerable and honest without fear of judgment¹⁴. Leaders and team managers have a particular responsibility to foster this climate of trust. They are expected to be role models: to adhere to declared values in their behaviour, to be open to criticism and different ideas, and to be willing to admit their own mistakes. Management should make it clear that mistakes are part of the learning process and that questions and objections are welcome. Research shows that in teams with high levels of psychological safety, people are more likely to take informed risks, propose innovations, and solve problems more quickly¹⁵. Creating a

¹³ page 29 HOW TO BUILD A GOOD SMALL NGO

¹⁴ <https://www.todoist.com/ru/inspiration/small-team-collaboration>

¹⁵ Psychological Safety at Work | American Federation of Teachers

trusting environment involves support and mutual assistance: colleagues are understanding of each other's challenges and assist when needed. Such atmosphere reduces stress and increases job satisfaction. In practice, this may include regular check-in meetings where the team's well-being, potential difficulties, and other topics are discussed. Confidentiality and privacy are also important: employees should be confident that personal discussions or complaints will be respected and will not become the subject of gossip.

5 Constructive conflict resolution.

Even in the friendliest teams, disagreements are inevitable, but the principle of safe cooperation requires that they be resolved constructively and respectfully. This means avoiding personal attacks, maintaining the commitment to dialogue, and focusing on the problem rather than the individual. The organisation should encourage active listening, empathy, and the pursuit of mutually acceptable solutions in conflict situations. A good practice is to have a robust mechanism for resolving disputes or complaints: for example, the ability to contact a neutral trusted individual (HR manager, ombudsperson) and the confidence in the conflict being handled fairly and without bias. Managers should be able to recognize emerging problems and intervene proactively, helping the parties reach a peaceful resolution. Impartiality and fairness are essential: all team members, regardless of status, must be treated equally under the accepted code of conduct, and violations (such as harassment) are considered objectively, with appropriate sanctions if confirmed. This policy makes it clear that everyone's safety is a priority and promotes a general sense of security.

6 Transparency and accountability.

A culture of respectful cooperation is inseparable from a trusting and transparent environment where team-related information is openly shared with employees and decisions are explained. Transparency in management decisions increases a sense of security by reducing the potential for rumours and misunderstandings. At the same time, each team member is accountable for their behaviour and contributions. Employees are expected to comply with shared ethical and interaction guidelines. Organisations often affirm these standards in codes or policies that the entire team is familiarised with and must sign. This ensures that everyone feels responsible for maintaining a respectful atmosphere. Leaders are also responsible for cultivating a culture of respect, regularly assessing the team climate, and taking steps to improve it when necessary. For example, in the UN system, managers

are required to actively promote a safe and harmonious work environment, serve as role models of ethical behaviour, and promptly respond to any instances of inappropriate treatment.

7 Training and harassment prevention.

Effective sexualised harassment prevention is impossible without systematic training and awareness-raising for all team members. The organisation should regularly conduct training on ethical interactions, harassment prevention, and respectful communication. This includes training sessions, seminars, or opportunities for sharing experience within the team. The goal is not only to respond to violations but also to prevent them through increased awareness and competence.

8 Preventing abuse of power.

A healthy work culture requires special attention to the balance of power and responsibility. Abuse of power is the use of position, authority, or influence to pressure, manipulate, pick favourites, exclude, or harass. Managers, coordinators, and decision makers should be aware of the impact their actions and words have on others, especially those in subordinate positions (e.g., interns, volunteers, junior employees). Prevention includes transparency in management processes, clear decision-making criteria, and feedback, along with mechanisms for team members to report violations and abuses safely. The organisation must create a culture in which power is perceived not as an instrument of control but as a responsibility for safety and fairness.

In conclusion, the basic principles of safe and respectful cooperation can be summarised in the following key points:

- **Mutual respect and equality:** all employees, regardless of status, are equally worthy of respect. Humiliation and biased treatment are unacceptable.
- **Inclusivity and involvement:** every team member has a say; diversity of opinions and experiences is valued, and the atmosphere in which everyone can share their thoughts without fear of judgment is essential.
- **Zero tolerance for discrimination and bullying:** the organisation is responsible for ensuring a workplace free of discrimination, harassment, and bullying; clear behaviour standards and measures against violations are set.

- **Trust and psychological safety:** trust is cultivated in the team – mistakes are viewed as experience, and criticism is presented constructively; employees know they will not be punished or humiliated for speaking their mind or making a mistake.
- **Open communication and feedback:** open and honest dialogue between all levels is encouraged – the management actively listens to the employees, ensures the transparency of decisions, and is open to feedback to avoid the disconnect between the management and the team.
- **Fair conflict resolution:** disputes are resolved through dialogue and seeking solutions, not with methods of force; there are mechanisms for resolving disputes respectfully, without retaliation.
- **Responsibility and role model status of leadership:** managers and experienced employees are role models of respectful and ethical behaviour; they carry an additional responsibility for maintaining a safe atmosphere, promptly reacting to issues, and being supportive of their colleagues.

These universal principles form the foundation for a culture of cooperation, where people feel included, protected, and motivated. Such culture is not only ethically important but also directly impacts efficiency: respectful and safe working conditions increase the team's engagement, creativity, and productivity.

Principles considering organisation size (specific for small, growing, and large teams)

The core values and norms described above are relevant to organisations of any scale, but the approaches to implementing them may differ depending on team size. What is easily maintained in a team of five may require different measures in a company with 100 employees. Organisation size influences the nature of communication, the degree of rule formalisation, and the existence of structures responsible for cultural management. Discussed below are the specifics of maintaining a safe and respectful work environment in teams of various sizes, with examples from the non-profit and media sectors:

Organisations under 10 people (small teams)

Characteristics. Very small organisations (for example, an activist group of ~5 – 7 volunteers, a local media outlet, or a small research team) operate as tightly knit units. Communication in such micro-collectives is predominantly informal: everyone knows one another well, and the decision-making process is collective, quick, and flexible. In such a small circle, interactions are frequent and direct, fostering strong group cohesion¹⁶.

Management structure. In small teams, various leadership and responsibility models are possible:

Informal hierarchical structure – around a coordinator or founder. Often in small teams, one person effectively takes on a leadership role, even if there is no formal leader¹⁷. This "informal leader" influences colleagues through personal qualities, experience, or charisma¹⁸. If such a leader is present in a team, it is important to:

- Ensure the transparency of their actions and decisions to avoid secret agendas and distrust.
- Regularly reevaluate and clarify their area of responsibility, preventing stagnant concentration of power in one person's hands.

¹⁶ Effective communication and fostering group cohesion in small teams

¹⁷ Who is the coordinator of a volunteer team?

¹⁸ The unofficial team leader. How to recognise them and what to do – Articles on NLP by NLP Institute

- Avoid treating work agreements as “friendly” expectations (for example, when formal rules are bypassed, because “we are all friends”). Blurred boundaries and excessive familiarity may damage the professional atmosphere¹⁹. It is crucial to maintain healthy subordination, even in a friendly environment.
- Have the leader be a role model of respecting coworkers’ personal boundaries and time, not abuse trust, and encourage the distribution of power – share information and involve others in decision-making, not focus everything on themselves.

Horizontal (non-hierarchical) structure – with equal distribution of responsibility and collective decision-making. Some small teams do not have a single leader: decisions are made by consensus, roles are rotated, and power is not centralised but shared among members. This structure is more democratic and increases engagement, but requires awareness of the invisible power distribution within the group. Even without formal titles, informal centres of influence can spontaneously form in any team: groups with shared interests or the influence of a charismatic, more experienced member²⁰. Without reflection, these hidden hierarchies can foster a toxic environment. Therefore, for teams with horizontal structure, it is essential to:

- Agree on basic rules of interaction from the start. Let them be informal but deliberate: for example, adopt a code of respectful communication, confidentiality of discussions, etc. (each team may develop its own principles)²¹. Such basic norms create a common reference point for behaviour within the group.
- Distribute roles openly and temporarily. It is helpful to rotate responsibilities — for example, appoint a new moderator or facilitator for each meeting and assign different people to keep minutes, store contact information, etc. This way, responsibilities circulate, and no one person is permanently in a position of power. Roles (including leadership functions) are aligned with current tasks rather than being tied to specific individuals, preventing monopolization of influence.
- Provide space for feedback and safe disagreement. The team should have channels for everyone to express concerns or opinions without fear of judgment – whether that is regular team meetings, anonymous surveys, or

¹⁹ Formal approach from the service standpoint

²⁰ How to foster teamwork on a leaderless team

²¹ Managing conflicts in small teams: Best Practice for small businesses | Appogee HR

support chats. An open culture and regular feedback sessions allow for issues to be raised early, before they escalate into conflicts.

- Not romanticise "horizontal structure", but rather make it a lively and meaningful process. A total lack of structure is utopian: even in flat organisations, informal leaders and connections emerge spontaneously. Acknowledging that some hierarchical elements will emerge anyway helps the group recognise and discuss them early. In other words, a flat structure requires constant attention and adjustment to remain healthy and inclusive.

General recommendations for teams under 10 people

- **Maintain honesty and openness in communications.** In a small team, the level of trust directly influences the climate; transparency in actions and words strengthens mutual respect and understanding.
- **Try to resolve conflicts immediately and directly.** In a tight-knit team, even a minor disagreement can quickly escalate, so it's best to address the issue as soon as it arises. Whenever possible, participants should speak directly with each other; if the situation reaches a dead end, consider inviting an external mediator to help resolve the tension constructively.
- **Have regular meetings where everyone can speak up and be heard.** Even with an informal work style, weekly team meetings or calls to discuss current tasks and the group's mood are helpful. These quick open meetings allow everyone to participate in the dialogue and prevent issues from being bottled up.
- **Establish core principles, even in a small team.** It's worth discussing and documenting the team's values and norms together. This could be a short manifesto, an oral charter, or an internal letter outlining what is accepted (and not accepted) regarding behaviour, interactions, and safety within your team. Formalizing key agreements helps the team remember the standard rules. For example, in small companies, experts recommend putting the existing culture and values on paper — then employees will see them more often and be more likely to adopt them²². Such a document (even in the form of a list of rules on the office wall or a note in a group chat) serves as a benchmark for current and new team members.

²² Corporate culture in small teams: how to foster

Example: A six-person eco-group runs an educational Telegram channel and has no formal leader. Members rotate responsibilities: each week, a new member becomes the moderator of the chat and internal meetings. The team also has an oral "non-violence pact": an agreement to respect each other's personal boundaries, avoid sarcasm toward colleagues, and not gloss over any tensions that arise; instead, bring them up for discussion at team meetings. Due to these simple rules and role rotation, the team maintains an atmosphere of trust and mutual respect, even without strict regulations.

Conclusion: In such micro-teams, the key to safe work lies not so much in complex policies as in trust, respect, and clear agreements tailored to the group's existing relationships and dynamics. When members feel mutual support, security, and shared values, a healthy work environment is formed, virtually free of bureaucracy. The most crucial part is ensuring that everyone on the team understands the common principles and voluntarily adheres to them. In that case, the team will be able to prevent harassment and resolve any issues respectfully, even without formal structures.

Organisations of 10 to 50 people (growing teams)

Characteristics. Small, growing organisations with 10 or more employees typically start by operating on the basis of informal relationships and trust. Communication in such groups is direct and non-hierarchical, often with a "family" atmosphere. However, as the team grows, the need arises to move from informality to the formalisation of management processes and behavioural norms²³. The lack of clear rules and procedures may blur the boundaries of acceptable behaviour, leading to incidents of unacceptable behaviour (such as harassment) going unrecognised. Research shows that in the absence of formal procedures, many cases of harassment go unreported, as survivors may hope to put up with the problem or do not know who to turn to.

Even in small teams, there is a risk of disrespectful or toxic behaviour. Global data shows that harassment is a widespread problem: according to European studies, up to 55% of women have experienced sexualised harassment in their careers²⁴. However, the vast majority of incidents go unrecognised – approximately 75% of employees who have been harassed do not file

²³ page 15 Violence and harassment @ work | RVO

²⁴ page 26 Violence Against Women: An EU-wide survey

complaints, fearing mistrust, inaction, or retaliation²⁵. In small teams, this is further exacerbated by the distribution of power: key decisions are reserved for the founders or a small circle of leaders who determine employees' careers and well-being. If the source of the problem is the manager or someone close to them, subordinates are especially likely to remain silent out of fear of causing harm to the team or facing retaliation. Thus, without formal measures, even a tight-knit team is vulnerable to hidden conflicts and rights violations. International labour standards emphasise that every worker has the right to a work environment free of violence and harassment²⁶. This requirement for a safe and respectful work environment for everyone applies to smaller organisations all the same.

Management structure. To ensure a respectful environment for groups of 10-50 people, it is necessary to implement elements of a formal management structure, responsible for preventing and combating harassment. First, management must clearly communicate its commitment to zero tolerance for violence and harassment. Such a signal from the top is crucial: if management fails to demonstrate commitment to the new policy, any efforts may be ineffective. Therefore, the adoption of an official zero-harassment policy should be formalized by a decision of senior management (director, board) and communicated to everyone in the organisation. Second, individuals or bodies authorized to handle complaints should be chosen. Small companies rarely have a dedicated HR department, so alternatives may include appointing a trusted employee (such as an ethics consultant) or establishing a small complaints committee. Experience shows that it's reasonable to establish such a body on a parity basis — for example, by including one management representative and one employee trained in conflict resolution methods²⁷. Gender balance in the committee's composition is also important to ensure that complainants feel comfortable: women are more likely to report sexualised harassment if they know they can contact a female commissioner. If resources do not allow for the creation of a committee, the minimum requirement is to appoint a neutral trusted person (ideally of the same gender as the survivor) to whom employees can confidentially report cases of mistreatment.

The management structure must provide a straightforward procedure for responding to harassment complaints. Internal regulations (policy) should contain the following key elements: an unambiguous statement prohibiting

²⁵ Select Task Force on the Study of Harassment in the Workplace Report of Co-Chairs Chai R. Feldblum & Victoria A. Lipnic Executive Summary & Recommendations

²⁶ Violence and harassment in the world of work | International Labour Organization

²⁷ page 17 GUIDELINES on THE PREVENTION of WORKPLACE HARASSMENT

all forms of harassment; a clear definition of which actions and statements are considered unacceptable; a procedure for filing and processing complaints; disciplinary actions for the offender (up to termination), as well as sanctions for deliberate false accusations; guarantees of protection and support for survivor; obligations to train staff and educate them about this issue; a mechanism for monitoring policy implementation. These components are consistent with international recommendations and should be tailored to the organisation's size. Confidentiality and impartiality are key principles of the response structure. Complaints must be handled with respect for the confidentiality of personal data, and individuals who report the problem cannot be subject to any punishment or harassment in response (prohibition of retaliation²⁸). Decisions on confirmed cases must be made by managers not involved in the conflict, based on an impartial review of the facts. In case of serious violations, the management structure must provide for the involvement of external agencies — for example, law enforcement (if criminal activity is involved) or higher-level organisations. Finally, the team's management process must include regular policy review and improvement: for example, once a year, management and employees can evaluate the effectiveness of measures taken, analyse new risks, and implement changes. Such adaptive management will allow the organisation to learn from experience and maintain a safe environment as it grows.

General recommendations for teams of 10 to 50 people

For growing mid-sized organisations, it is recommended to adopt a set of measures to prevent and combat harassment. Described below are the basic steps to ensure safe and respectful cooperation within the team:

- **Formulating and implementing a zero-tolerance policy.** A code of conduct prohibiting all forms of violence, harassment, and discrimination in the workplace must be formally established. The document needs to define harassment (both sexualised and psychological), provide examples of unacceptable behaviour, and clearly state that violations will result in disciplinary action, up to termination. All employees (including temporary workers, interns, and volunteers) must be familiarised with this policy and sign it. This way, the organisation clearly states its values and sets equal standards for everyone.

²⁸ Retaliation — any adverse actions against the person who has reported a violation (e.g., a sexual harassment incident) with the purpose of punishment, intimidation, or isolating them. Retaliation includes termination, demotion, worsening of working conditions, ignoring, bullying, exclusion from work processes, or other forms of pressure.

- **Multi-channel complaint-filing procedures.** Convenient and secure ways to report a problem should be provided. It is recommended to establish multiple channels for complaints — for example, to the immediate supervisor, an alternate manager in another department, the ethics committee, or an anonymous email/helpline²⁹. Diversity in reporting channels is essential so employees can bypass their supervisor if the supervisor is the source of the problem. All complaints must be registered and thoroughly investigated by authorised persons. The employer is obliged to ensure that no sanctions or retaliation will be imposed on the complainant. Investigations are kept highly confidential (information is shared only with those who need it). Following the investigation, appropriate disciplinary action is taken: penalties are proportionate to the offense's severity and may include termination of employment. Punishments must be applied consistently to everyone, without leniency to valuable employees or managers — this is important for maintaining trust in the system.
- **Training and fostering a culture of respect.** Formal rules alone are not enough; systematic educational efforts are necessary. It is recommended that the entire team participate in regular training sessions on the unacceptability of harassment and how to respond to it. Training should be practice-oriented and interactive, not just limited to legal definitions. Experts recommend introducing new formats, such as bystander intervention training, to teach employees to support colleagues and stop inappropriate behaviour. Programs that help develop a culture of respectful communication (including training in etiquette and non-discrimination) are also effective. Particular attention is paid to the training of line managers: foremen, heads of small departments – they should be taught to notice early signs of conflict and respond appropriately to complaints. Building a zero-tolerance culture begins with leaders' daily example: when managers consistently demonstrate a respectful attitude and immediately stop offensive jokes, bullying, or sexist remarks, they set the tone for the entire organisation. At the same time, open dialogue is encouraged: employees should know they can raise concerns safely, and that management values feedback (for example, through anonymous surveys on workplace well-being).
- **Proactively addressing risks.** Organisations should evaluate the environment for factors that contribute to toxic behaviour. Research indicates that typical risk factors for harassment include gender

²⁹ page 37

https://www.eeoc.gov/sites/default/files/migrated_files/eeoc/task_force/harassment/report.pdf

stereotypes, power imbalances (e.g., single-gender leadership, lack of accountability among managers), and a tolerance for borderline offensive "jokes"³⁰. Once weak points are identified, preventive measures must be implemented. For example, if power is concentrated in one individual's hands, it is reasonable to introduce checks and balances (such as multiple people handling complaints and the opportunity to appeal). If the workforce is homogeneous (e.g., predominantly young men), it is helpful to conduct diversity and respect training and, when hiring, strive to increase the representation of women and other groups on the staff. Research shows that increasing the number of women in leadership positions has a positive impact on the climate: the range of management styles expands, and the atmosphere of support and trust grows stronger³¹. Employers should also consider external factors: for example, if employees work late hours or travel often, additional safety measures (such as rides home, working in pairs, etc.) must be put in place. It is vital to integrate anti-harassment measures into the HR management system, from the recruitment stage (communicating the policy to candidates and including anti-harassment provisions in employment contracts) to termination processes (investigating causes when conflicts are involved). This strategic approach reduces the likelihood of incidents and ensures the organisation is proactively committed to staff well-being.

- **Response and support for survivors.** If, despite preventive measures, a harassment incident occurs, the organisation's response must be prompt and appropriate. The response algorithm includes: a timely examination of the facts, observing the presumption of innocence until the very end of the investigation; temporary separation of the disputing parties (for example, transferring the offender to a different location while the investigation takes place); informing survivor of their rights and available options (including the possibility of contacting the police); taking measures based on the investigation results and communicating the decision to all involved. It is imperative to offer the survivor necessary assistance — be it psychological support, medical care, or legal advice. A culture of support means the survivor is in no way blamed for the incident and is not subjected to negative comments. On the contrary, openly acknowledging the problem and punishing the offender creates a precedent that increases employees' confidence in the protection system. After the incident, managers are advised to analyse what was missed in the prevention process and to strengthen measures (for example, by conducting special training or reviewing internal procedures).

³⁰ Recommendation 206

³¹ Violence and harassment @ work | RVO

Together, these recommendations form a comprehensive system for creating a safe and respectful work environment. Experience shows that even small organisations can effectively combat harassment by implementing such measures. The key to success is management's constant attention to this issue and all employees' involvement in fostering a zero-tolerance culture.

Example: A small manufacturing company (approximately 50 employees) implemented a comprehensive anti-violence and anti-harassment policy and achieved lasting changes in its corporate culture. Management formally announced a zero-tolerance policy: at the time of hire, every new employee is briefed on a strict zero-harassment policy, including a clause stating that any sexualised harassment incident is grounds for termination. This clause is included in employment contracts, and management has made it clear that violators will be punished without exception. The company also took steps to improve the gender balance and power distribution. Over the course of three years, it deliberately increased the proportion of women in management positions to 50% and prioritised qualified female employees for promotion. This strategy reduced the risk of abuse by management and strengthened women's voices in decision-making. The policy was backed by decisive action: for example, when one of the managers attempted to abuse his position by requesting a sexual favour from a subordinate, the offender's guilt was proven (the employee recorded the conversation), and his contract was immediately terminated. The entire team was informed that their termination was due to their abuse of power. Furthermore, the company took measures to prevent aggression: managers were specifically trained to suppress any manifestations of workplace violence. Overall, the company implemented the principles recommended by international organisations: a combination of policy, training, structural changes, and leadership that set a positive example, helped eradicate toxic behaviour and create a safe, trusting environment for every employee.

Conclusion: Creating and implementing a safe and respectful work environment policy not only helps prevent harassment but also builds trust within the team, increases motivation, and helps maintain the organisation's good reputation. International experience and standards (such as ILO Convention No. 190) serve as a guide for such groups, emphasizing that, regardless of an organisation's size, respect for the dignity of every employee and zero tolerance for harassment are fundamental principles of the modern workplace.

Organisations of 50+ people (large teams)

Characteristics. Large organisations (with 50 or more employees) are characterised by a complex structure and formal procedures. They typically have a well-established corporate culture, with various departments and management levels. Such a hierarchy creates a greater power imbalance between rank-and-file employees and management, posing specific risks. Research indicates that informal influence and skewed representation (for example, male dominance in leadership positions) increase the likelihood of inappropriate behaviour³². Beyond the overt hierarchy, hidden power structures may exist — such as informal networks and "cultures of silence" — where specific individuals wield disproportionate influence. In such environments, complaints of harassment are often hushed up or dismissed: the survivor may be advised not to "make a big deal out of it" or even to tolerate the harassment³³. This is dangerous not only from an ethical perspective but also from a practical one: tolerating harassment leads to serious legal, reputational, and financial risks³⁴ for the organisation. Therefore, it is vital for large teams to understand the specifics of their internal dynamics and promptly identify factors that undermine a safe and respectful atmosphere.

Management structure. Organisational hierarchy in large companies requires a clear system for preventing and handling harassment incidents. Response functions must not be limited to immediate supervisors; employees should be able to report incidents outside their direct management chain. Best practices call for creating a separate anti-harassment program with neutral commissioners from structures not involved in the conflict³⁵. This means that complaints are investigated by specially trained individuals (e.g., the HR department or an ethics committee) who are independent of the accused, ensuring impartiality and confidentiality. Senior management bears a special responsibility: leadership must demonstrate a "tone at the top"³⁶ by publicly affirming a zero-tolerance policy and personally overseeing its implementation. In large organisations, it is vital to implement a multi-tiered

³² How the humanitarian sector is taking action after its #MeToo moment - Oxfam Canada

³³ ILO Convention on harassment prevention: the importance of protection of particularly vulnerable women

³⁴ Workplace culture and conduct | Deloitte | Finance

³⁵ <https://www.eeoc.gov/federal-sector/reports/promising-practices-preventing-harassment-federal-sector#:~:text=,10>

³⁶ Wood, David A. (Spring 2015). "An Examination of How Entry-Level Staff Auditors Respond to Tone at the Top vis-à-vis Tone at the Bottom". *Behavioral Research in Accounting*. 27 (1): 79–98. doi:10.2308/bria-50918.

complaint-filing system — from trusted contacts within departments to anonymous hotlines or direct appeals to higher authorities. This mechanism reduces the influence of potential "unwritten rules" and internal connections that could previously block or ignore signals of concern. Furthermore, the formal structure should provide protection against retribution: employees should be confident that they will not face sanctions or career damage for filing a complaint. The principle of the inevitability of punishment is also critical: regardless of the offender's status, proportionate disciplinary measures must be applied, and those found guilty of harassment must not hide behind their position. Consistent management policies and a transparent incident-handling system are key to overcoming hidden barriers and creating a truly safe corporate culture.

General recommendations for teams of 50+ people

To ensure a respectful and safe work environment in large teams, a comprehensive set of measures must be implemented. Based on the findings of international organisations (ILO, UN, EEOC, etc.) and analytical studies, the following key recommendations can be identified:

- **Clear policies and standards.** Develop and implement a comprehensive anti-harassment policy that clearly outlines unacceptable behaviour and applies to all staff levels. The policy must be regularly communicated to employees (e.g., via a newsletter and by making it visible in the office). It should directly state a zero-tolerance policy for any form of discrimination or harassment.
- **Multiple complaint-filing channels.** Provide employees with safe and diverse ways to report incidents of harassment. In addition to their immediate supervisor, there should be alternative routes, such as direct reporting to the ethics or HR department, anonymous hotlines, or external ombudspersons. Having channels outside the direct management chain is especially important if the immediate supervisor is involved in the conflict.
- **Protecting complainants from retaliation.** Ensure that no employee is punished for filing a complaint in good faith or participating in an investigation. The principle of protection from retaliation must be codified in policy and reinforced by practice: any pressure on a complainant is unacceptable and punishable in itself. The organisation also commits to maintaining confidentiality — information about the identities of the complainant, witnesses, and survivor is not disclosed unless necessary.

- **Prompt investigation and sanctions.** Establish rapid response standards: every reported incident of harassment must be investigated promptly, objectively, and within a reasonable timeframe. Investigations must be conducted by competent individuals with no conflict of interest, and measures must be taken based on their findings. Disciplinary action for confirmed cases of harassment must be proportionate to the severity of the violation and applied consistently to everyone, from rank-and-file employees to senior managers. At the same time, any steps to prevent violations must not have negative consequences for the survivor (for example, transferring or terminating the survivor is unacceptable).
- **Training and education.** Conduct regular training and educational programs for the whole staff. Training should be interactive and tailored to the organisation's specific situation, from working examples to clarifying the boundaries of acceptable behaviour. Particular emphasis should be placed on fostering a culture of respect and on bystander intervention skills³⁷: research shows that training in these areas helps prevent the escalation of unwanted behaviour before it leads to a serious incident. Executives and managers receive separate training on harassment prevention and appropriate complaint response, including trauma-informed³⁸ communication skills with the survivor.
- **Leadership and accountability.** The tone from the top sets the scene: senior management must openly support anti-harassment initiatives. The practice of the head of organisation annually reaffirming the commitment to a zero-tolerance policy has proven effective. It is also important to integrate safe environment metrics into manager evaluation systems: for example, by taking into account the absence of complaints in a department and preventive actions during performance reviews, or, conversely, by excluding those found guilty of harassment from promotion. Such accountability encourages middle management to actively support a respectful culture.
- **Monitoring and prevention.** Large organisations must regularly assess the workplace climate. This includes anonymous employee surveys on safety, analysis of complaint and termination statistics, and identification of risk areas (e.g., departments with high stress levels or high turnover). Early identification of risk factors (such as monotony of work, gender imbalance, significant status differences between employee groups) and their

³⁷ Stepping Up to Stop Sexual Assault - The New York Times

³⁸ Kolk, Bessel (2014). *The Body Keeps the Score: Brain, Mind, and Body in the Healing of Trauma*. Viking. ISBN 978-0670785933.

elimination will help prevent problems before they lead to incidents. For example, if it is discovered that informal, rude communication norms prevail in a particular department, management can conduct unscheduled ethics training there and increase control.

- **Diversity and inclusivity.** One of the long-term measures is to develop an inclusive culture, involving representatives of different genders and groups in leadership roles. Researchers emphasise that power imbalances underlie many cases of sexualised violence. Therefore, organisations must strive for more balanced leadership, encourage women to assume management positions, and support diversity of opinions. This breaks the "monopoly of influence" held by certain groups and creates a more equitable work environment.

Example: A clear example of successful measures is Oxfam, an international non-profit organisation, following the 2018 crisis. Faced with instances of sexualised abuse of power, Oxfam's leadership took unprecedented steps to change the corporate culture. The organisation significantly increased the budget and staff allocated to worker protection, including expanding staff training programs and strengthening its investigation departments³⁹. Employees were actively encouraged to report violations: Oxfam publicly called on the injured parties and witnesses to come forward, guaranteeing them support and an objective investigation. Moreover, an independent, high-level commission on sexualised misconduct, accountability, and culture change was established to allow outside experts to analyse the existing situation and recommend improvements. At the same time, Oxfam joined a sector-wide initiative: together with other humanitarian NGOs, it established a Leaders' Code (Pledge) on the Prevention of Sexualised Violence, committing to implement best practices across all its programs. This case demonstrates that even a large and complexly structured organisation can transform its processes to make them safer. As a result of these measures, Oxfam announced an "unwavering commitment" to creating a violence-free workplace and set an example of proactive leadership and cultural investment effectively reducing harassment.

Conclusion: In organisations with 50 or more employees, maintaining a safe and respectful work environment requires a systematic, formalised approach. At this stage, the structure's scale and complexity increase the risk of hidden hierarchies, the hushing up of incidents, and ineffective responses. Best international practices (ILO, EEOC, UN Women, FRA) indicate that the key elements of a successful anti-harassment policy in large organisations include:

³⁹ How the humanitarian sector is taking action after its #MeToo moment - Oxfam Canada

clearly defined standards, multi-level complaint-filing channels, protection from retaliation, regular staff training, and leadership that demonstrates zero tolerance for violations of rights. For organisations of this size, anti-harassment cannot be an optional measure — it is a mandatory, integrated part of corporate policy and long-term development strategy.

“Contract” of a safe environment

The "contract" model, in the context of anti-harassment policy, is a conditional agreement between an organisation and its participants (employees, volunteers, activists, etc.) to adhere to specific behavioural standards. In other words, it is a "code of conduct" that both parties agree to follow to maintain a safe and respectful environment.

Within such an agreement, it is important to distinguish between the parties' internal responsibilities and the organisation's public commitments. The parties' internal responsibilities are specific actions and rules that each party (the organisation and individuals) must adhere to within the organisation's internal processes. Public commitments, on the other hand, are formal promises the organisation makes to the community (declaring its commitment to the principles of a safe environment). Both aspects complement each other: the former provides practical measures to prevent and combat harassment, while the latter demonstrates transparency and accountability, fostering trust in the community. We believe it is reasonable to include both elements in the document to reflect the internal and external aspects of combating harassment.

Described below are the components of a "contract" model that may be included in the document. (The specific contents of each subsection are expected to be developed collaboratively with all community members, so definitions, characteristics, and examples are provided here for guidance only)

Responsibilities of the Parties

Responsibilities of the organisation

The organisation is responsible for creating and maintaining a work environment free of discrimination and harassment. To do so, it must take specific steps, such as: developing an ethical code and implementing a clear anti-harassment policy that covers all forms of unacceptable behaviour⁴⁰; providing straightforward procedures for filing complaints and responding to incidents; and addressing all instances of inappropriate behaviour, even if they do not initially meet the legal definition of harassment. Best practices require the management to promptly and impartially investigate all complaints and take action based on the findings. The organisation is also obligated to regularly train staff: conduct harassment prevention training, inform them that such actions are unacceptable, and explain how to respond to them. Research⁴¹ emphasises that training should focus not only on legal literacy but also on developing skills for intervention⁴² and incident prevention. No one should be exempt from such training — neither ordinary employees nor senior managers.

It is important to emphasise the role of leadership: managers and heads of departments have a special responsibility to actively support anti-harassment policies. Specifically, it is recommended to establish that any instance of harassment that comes to a manager's attention must be reported to the appropriate department or senior management. Managers must personally demonstrate a commitment to respectful treatment principles. As the Nonprofit Risk Management Center notes, "leaders must adhere to their own policies and actively root out and condemn sexualised harassment in the work environment". This means that management is obligated not only to adhere to policies on paper but also to be role models of zero tolerance for harassment.

⁴⁰ Workplace Harassment: An Unacceptable Risk | Nonprofit Risk Management Center

⁴¹ Why Women are Still Underrepresented in Nonprofit Leadership and What We Can Do About It

⁴² <https://nonprofitquarterly.org/women-in-power-or-not-so-much-gender-in-the-nonprofit-sector/>

Responsibilities of employees and participants

Each member of a team or community, by joining the "contract" of conduct, also assumes certain responsibilities. First and foremost, this includes refraining from any form of harassment and respecting colleagues' personal boundaries and dignity. Amnesty International's Code of Conduct clearly states that we all have the right and responsibility to create an environment free of harassment, discrimination, and bullying⁴³. This means everyone should treat one another with dignity and respect, value the differences and contributions of others, and maintain open and constructive communication. Furthermore, participants are required to follow established rules (e.g., dress codes and ethical standards, if specified), promptly report any harassment they witness or experience, and cooperate with investigators. The EEOC's guidelines emphasise that employees are encouraged to report unacceptable behaviour as early as possible⁴⁴, allowing the organisation to take action before the situation escalates. All participants are also expected to take a proactive stance: whenever possible, confront toxic behaviour, be a "bystander," offering support to the survivor, and/or bring the issue to the management's attention.

To ensure the parties' responsibilities are not merely declaratory, it is essential to establish responsibility for their implementation. This could be an authorised person (e.g., an ethics or safe environment coordinator), an ethics committee, or an HR manager. This person will be responsible for receiving complaints, conducting investigations, and training staff. Assigning responsible persons increases transparency and trust in the process.

Thus, the "parties' responsibilities" outline what the organisation and its participants specifically do to maintain a safe and respectful environment. A detailed list of these responsibilities (e.g., conducting annual training, appointing an ethics officer, ensuring employees comply with policies) will be developed collaboratively.

In **Appendix 1**, there is an example of the "Contract of Conduct".

In **Appendix 2**, you can find the chart "Responsibility → Concrete Measure → Example of Implementation" (for training and adapting for different organisations).

⁴³ page 2 amnesty international uk section - activist code of conduct

⁴⁴ <https://www.eeoc.gov/federal-sector/reports/promising-practices-preventing-harassment-federal-sector#:~:text=,31>

Public commitments (Public Commitments to Maintaining a Safe Environment)

4.2.1 What are the organisation's public commitments?

Public commitments are the organisation's formal assurances to maintain a safe and respectful environment, outlined in public documents. These include various forms of statements and promises made publicly by the organisation, such as pledges, declarations, codes of conduct, and open letters. In such documents, the organisation explicitly states a zero-tolerance policy toward sexualised harassment and describes measures to prevent and respond to it. For example, 116 NGOs have signed the CEO Pledge — a promise by NGO leaders to strengthen their policies for preventing sexual exploitation and harassment, protecting both employees and beneficiaries⁴⁵. This pledge, on behalf of leadership, solidifies the intention to adhere to existing standards and take additional steps to create a safe environment⁴⁶. Public commitments can be issued as a stand-alone document (for example, a code of ethics) or included in the organisation's broader manifesto. The key is to make them publicly accessible and to set the tone for an ethical culture within the organisation.

4.2.2 Why are public commitments necessary?

Public commitment to maintaining a safe environment has several functions:

- Firstly, **it builds trust** — both within the team and among partners, donors, and target audiences. An organisation that has openly declared zero tolerance for harassment demonstrates its seriousness and willingness to take responsibility. For example, humanitarian organisations link such pledges to restoring trust: "Trust in our sector can only be restored through open discussion of issues and decisive action against abuses⁴⁷."
- Secondly, public commitments **enhance accountability**: once a promise is made publicly, stakeholders have the right to demand its fulfilment. This creates a mechanism for public oversight and encourages management to actually implement stated standards.

⁴⁵ NGOs Pledge Further Steps to Tackle Abuse by Staff - The International Catholic Migration Commission (ICMC)

⁴⁶ CEO Pledge on the Prevention of Sexual Abuse, Exploitation, and Harassment - Refugees International

⁴⁷ 'We stand together': open letter on sexual misconduct in aid sector | Global development | The Guardian

- Thirdly, such declarations **establish an ethical culture**. They clearly state that harassment will not be tolerated, thereby creating an atmosphere in which perpetrators remember about the inevitability of consequences and survivors feel supported. As noted in a joint commitment by several organisations, preventing sexualised violence requires "proactively creating a safe and trusting environment based on principles of respect and ethics, with the implementation of survivor-centred reporting mechanisms"⁴⁸."
- Finally, public commitments **reduce the risk of harassment**: employees are aware of standards of conduct, complaint-filing channels, and the management's involvement in resolving the issue. Altogether, this leads to a healthier team climate and protects the organisation's reputation. For example, after internal scandals, Amnesty International⁴⁹ was forced to admit that it could not effectively defend human rights outside the organisation without changing its own organisational culture⁵⁰. To restore employees' trust⁵¹, Amnesty International has adopted a new code of conduct with clear anti-harassment requirements and mechanisms for investigating violations.

Thus, public commitments are both a preventive and a trust-building tool, emphasising that the organisation takes the problem of harassment seriously.

4.2.3 Forms of publishing the commitments

To ensure public commitments don't remain mere formality, it's important to communicate them effectively to all stakeholders. There are several ways to make such promises known:

- **Organisation's website.** Most often, the pledge or code is published on the official website. It may be a separate "Our Principles" page or a subsection within the "About Us" section. For example, many international NGOs post their safety policies on their website and note their adherence to the CEO

⁴⁸ Commitment to prevent and respond to sexual exploitation and abuse and sexual harassment (SEAH) in humanitarian action – Statutory Meetings

⁴⁹ Amnesty International is an international non-governmental organisation dedicated to protecting human rights worldwide. Amnesty conducts campaigns against human rights violations, publishes reports on cases of violence, discrimination, and unfair trials, and works to raise awareness and promote legal reform.
<https://www.amnesty.org>

⁵⁰ Amnesty International has toxic working culture, report finds

⁵¹ IDEA | Amnesty International USA

Pledge, even including annual incident reports. InterAction⁵² encouraged its pledge participants to share versions of their policies publicly to demonstrate transparency.

- **Documents for partners.** Including a safe environment declaration in memoranda of cooperation, donor agreements, or partnership documents increases the importance of the topic. Partners see that the organisation is paying attention to the topic and adopt similar expectations. Thus, by signing the CEO Pledge, ICMC⁵³ leadership noted the importance of communicating this commitment to beneficiaries, partners, and colleagues.
- **Open letters and media.** Sometimes groups of organisations or opinion leaders publish open letters or joint appeals reaffirming their commitment to combating harassment. For example, in 2018, more than 1,000 humanitarian workers signed the open letter “We Stand Together⁵⁴,” demanding reforms and pledging to speak out about harassment cases. Such a letter, when published in the media, is in itself a public commitment and attracts widespread attention.
- **Newsletters and social media.** An organisation may announce the adoption of a code or pledge via a press release, newsletter, or social media posts. This helps spread information to a broader audience and to set the tone from the top. Managers can make a personal statement (for example, a video message from the CEO about their commitment to zero tolerance).
- **Events and training.** Another format is announcing commitments at public events (conferences, panels) or during the onboarding of new employees and volunteers. For example, during induction training, newcomers can be introduced to the code of conduct and asked to sign a written agreement to adhere to it. This approach demonstrates that the topic of a safe environment is embedded in all organisational processes, starting with the onboarding of newcomers.

⁵² InterAction is the USA's largest coalition of humanitarian and international non-governmental organisations that work in international development and provide assistance. InterAction develops standards, coordinates collaborative actions of NGOs, and promotes ethical and responsible humanitarian action, including sexual violence and harassment prevention.

⁵³ International Catholic Migration Commission is an international organisation that serves and protects displaced people, including people with experiences of migration, asylum-seeking, and internal displacement, regardless of religion, race, ethnicity, or nationality.
<https://www.icmc.net/>

⁵⁴ 'We stand together': open letter on sexual misconduct in aid sector | Global development | The Guardian

- **Internal communication.** Although the commitment is public, it's important to consistently remind the team of it: put up posters in the office, discuss it in meetings, and update the ethics manual. This ensures that those fine words are not forgotten and actually affect daily behaviour.

All channels mentioned above complement each other. The main goal is to make the commitment known and clear to everyone who interacts with the organisation. When principles are publicly stated and communicated, employees are more likely to trust management to deliver on their promises, and external stakeholders see consistency between words and actions.

The public commitment template is provided in **Appendix 3**.

This public commitment is programmatic in nature: it clearly and concisely articulates key principles and measures that are understandable to a wide range of people. Belarusian organisations operating in exile can tailor the provided template to their specific needs — for example, by adding clauses on cultural sensitivity or working with the online space, if relevant. It's important that the statements remain clear and actionable. Five to seven key points are sufficient and can easily be included in the "About Us" section or in the introductory paragraph of the code of conduct.

By publishing such a commitment, organisations not only declare their values but also assume responsibility for upholding them. For the target audience — Belarusian NGOs, media, and initiatives — this signals that their commitment to maintaining a safe and respectful environment is taken seriously, wherever the community operates: whether in an office in exile, a volunteer camp, or an online communication platform. This is the foundation for trust and effective cooperation.

4.2.4 Cases of international organisations

Many international organisations and associations have already adopted similar public commitments, serving as a benchmark for others. Let us look at some of them.

- **InterAction CEO Pledge.** InterAction – the largest coalition of humanitarian NGOs in the US – launched the CEO Pledge to prevent sexual exploitation, abuse, and harassment in 2018. Initially signed by 116, it was later signed by over 140 NGO executives. The pledge includes specific commitments: to create a harassment-free work environment; to strengthen procedures and

commitments: to create a harassment-free work environment; to strengthen procedures and transparency; to establish confidential reporting mechanisms without fear of retaliation; to publish annual incident reports; and more. A key feature is mutual learning and collective action: the organisations' leaders agreed to share lessons and disclose difficult cases to work together on improving the practices. This pledge demonstrated a united NGO front against abuse, strengthening trust in the sector. The CEO Pledge is available publicly⁵⁵, and many InterAction members have published related policies on their websites. This case proves that industry-wide self-organisation around a problem can set a high ethical standard.

- Do No Harm Pledge. The Do No Harm principle has long been known in humanitarian work, and now it has been applied to the prevention of gender-based violence. Some campaigns ask participants to take the Do No Harm Pledge, committing to do no harm and to actively oppose violence. For example, in Nigeria, as part of the 16 Days of Activism against Gender-Based Violence action, public figures took the Do No Harm Pledge, promising to report cases of violence against women and girls⁵⁶. This pledge, although symbolic, publicly records the personal commitment of opinion leaders and employees not to remain indifferent. Similarly, the Do No Harm principle is incorporated into organisational policies as a commitment to avoid actions that could harm beneficiaries or colleagues at all costs. By formalising it as a pledge, the organisation declares that it will, above all, prevent harm to its participants, including harassment.
- The “Enough is Enough” Campaign. The slogan “Enough is Enough” has become an international call to end sexualised violence and harassment. In the wake of the #MeToo movement, a number of initiatives have come forward under the slogan “Enough is Enough,” calling for cultural change. For example, in 2017, the International Federation of Actors (FIA) unanimously adopted a declaration against sexualised harassment in the entertainment industry, declaring “Enough is Enough!” – there by demonstrating that the existing culture of silence will no longer be tolerated⁵⁷. Campaigns with this name have taken place on college campuses, in media, and in humanitarian organisations – all with the same message: no more silence and impunity.

⁵⁵ CEO PLEDGE ON PREVENTING SEXUAL ABUSE, EXPLOITATION, AND HARASSMENT BY AND OF NGO STAFF | InterAction

⁵⁶ 16 Days of Activism: CSO campaigns against gender-based violence

⁵⁷ Sexual Harassment – FIA

Oxfam⁵⁸ launched the global “Say Enough” campaign to end violence against women, integrating public pledges from leaders, training programs, and community mobilisation⁵⁹. While “Enough is Enough” is not always formalised into a single document, it's more of a public commitment expressed through a social campaign: organisations and individuals publicly declare that they will not tolerate sexualised violence and will push for real action. For Belarusian organisations in exile, such a slogan can also be a powerful signal of solidarity with the global anti-harassment movement.

UN Women⁶⁰ and other UN initiatives. UN Women encourages governments, media outlets, and organisations to publicly commit to ensuring gender equality and safety. One example is Step It Up for Gender Equality: Media Compact⁶¹, during which more than 100 media organisations worldwide pledged to become “gender champions” in their work. Signatories to this media compact pledged to promote women’s rights and ensure gender balance in editorial content and corporate policies. In doing so, media outlets publicly confirmed their responsibility for creating a respectful environment both within editorial offices and in the information space. Another example is the Safe Cities and Safe Public Spaces program from UN Women⁶², where cities sign declarations to combat sexualised violence in public spaces. City halls make public commitments to implementing measures to ensure women and girls feel safe in urban spaces. Furthermore, UN Women, together with media and corporations, is initiating campaigns during the 16 Days of Activism against Gender-Based Violence⁶³, calling on employers to publicly commit to zero tolerance for sexualised harassment in the workplace. Thus, through the UN platform, a global framework is being established in which a public commitment is already a norm expected from a responsible organisation.

⁵⁸ Oxfam is an international confederation of 21 non-governmental organisations working in more than 90 countries to combat poverty, inequality, and injustice. Oxfam provides humanitarian aid, develops resilient communities, promotes gender equality and human rights, and actively implements standards for the prevention of sexualised violence and harassment in the humanitarian sector.

<https://www.oxfam.org>

⁵⁹ Violence against women and girls: enough is enough | Oxfam International

⁶⁰ UN Women is a United Nations entity dedicated to gender equality and the empowerment of women.

<https://www.unwomen.org/en>

⁶¹ Get involved: Step It Up for Gender Equality | UN Women – Headquarters

⁶² Safe Cities and Safe Public Spaces - GLOBAL RESULTS REPORT

⁶³ 16 Days of Activism against Gender-Based Violence | UN Women – Headquarters

- Amnesty International⁶⁴. Being the world's largest human rights organisation, Amnesty International implemented significant reforms to its ethics policy following criticism of its working conditions. This case is important because it demonstrates that public commitment begins with internal action to address mistakes. In 2019, an external audit uncovered a toxic work culture at the organisation — harassment, burnout, and broken trust. In response, Amnesty's leadership publicly acknowledged the problems and announced a course toward "zero toxicity". A new Code of Conduct was developed, in which every member of the organisation pledges to respect the dignity of others, harassment and discrimination are prohibited, and complaint mechanisms are established⁶⁵. Amnesty essentially made a promise to its employees and to society to align its internal culture with human rights values. This case illustrates that the organisation's public commitments can be directed not only outward (toward beneficiaries) but also inward (toward its employees). Recognising issues and public commitment to improvement helped Amnesty begin to rebuild trust. This approach is also relevant for Belarusian NGOs: it's crucial not only to demand justice externally but also to reaffirm their commitment to the "Principles" within their own organisations.

(In addition to those listed, there are other international initiatives: for example, the #MeToo⁶⁶ and Time's Up⁶⁷ campaigns, the Declaration on the Prevention of Sexual Exploitation in Humanitarian Aid⁶⁸ (signed by world governments and UN agencies), the UN Women's Media Compact⁶⁹, etc.)

⁶⁴ <https://www.amnesty.org/en/>

⁶⁵ IDEA | Amnesty International USA

⁶⁶ #MeToo is a social movement and awareness-raising campaign against sexualised violence, sexual harassment, and rape culture, in which survivors share their experiences of sexualised violence or harassment.
<https://metoomvmt.org/>

⁶⁷ Time's Up is a non-profit organisation that raises funds to support survivors of sexual harassment.
<https://timesupuk.org/>

⁶⁸ Toolkit to Support Implementation of the OECD DAC Recommendation on Ending Sexual Exploitation Abuse and Harassment (EN)

⁶⁹ UN Women Media Compact | Partnerships

Sanctions (disciplinary measures for violating agreements)

Everyone participating in the initiative must understand that no disrespectful or inappropriate behaviour will go unpunished. International recommendations emphasise the principle of "no impunity" — that violations of agreements constitute disciplinary offences — and appropriate penalties are established⁷⁰. Organisation's policies must clearly articulate which actions are considered violations (from offensive jokes and discriminatory remarks to outright violence) and the sanctions that follow. Particular attention is paid to survivors' rights — complaints are processed promptly and confidentially, and the complainant's protection is ensured⁷¹.

- **Low severity** (e.g., an inappropriate joke or comment): oral warning, explanation of why the behaviour is unacceptable, and, if necessary, mandatory training on gender equality and ethics.
- **Moderate severity** (persistent harassment, offensive or sexualised language): written warning, temporary suspension from participation in events, referral to a mediator or ethics expert. For example, it is recommended to combine punitive and restorative measures to give the offender a chance to improve⁷².
- **High severity** (physical or sexualised violence, systematic harassment): immediate termination of employment contract and all forms of cooperation with the offender, referral of the case (if necessary) to the authorities. Such actions constitute a serious violation of the "Principles" and may result in permanent exclusion from the project or event. In line with UN practice, any instance of sexualised harassment may result in termination of senior staff⁷³.

Different roles require adapting the solutions:

- **Community member:** Even casual participants must adhere to the code of conduct. A single violation may result in a warning or a conversation, while repeated violations may result in disqualification from participation. Serious misconduct results in exclusion from the group.

⁷⁰ page 4 Policy on Respect and Dignity in the Council of Europe

⁷¹ Code of practice to clamp down on sexual harassment at work | EUR-Lex

⁷² PoSH | Jhatkaa.org

⁷³ UN System Model Policy on Sexual Harassment

- **Coordinator/manager:** has increased responsibility for the team culture. For a violation of ethical standards, the manager may be formally reprimanded and required to make a public apology; repeated or severe violations may result in suspension of leadership functions and a ban on further participation. For example, the Human Rights House Foundation terminated the organisation's membership in the network for "serious and prolonged violations of the Code of Ethics"⁷⁴.
- **Invited expert:** is responsible for how they act at the event. For inappropriate behaviour – cancellation of the performance, public apology, or temporary ban from participation; if repeated – refusal to collaborate in the future and informing the organisers of the violation.
- **Employee:** actions are assessed through the lens of labour laws and internal regulations. Measures range from a remark in a person's file to disciplinary action or termination. According to the UN Model, "power and rank do not confer impunity" – any employee, including management, can be fired for sexualised harassment⁷⁵.
- **Restorative measures:** mediation, group discussion, and training are used to restore trust in addition to punishment. This combination of corrective and restorative measures helps resolve the situation without "unnecessary measures." The incident review committee is obligated to act professionally and respectfully, support survivors, and prevent retaliation.

In all cases, the organisation considers the principles of proportionality and fairness when imposing sanctions. The goal of these measures is not only to punish but, above all, to strengthen a culture of accountability and the protection of human rights within the community.

⁷⁴ Statement concerning the discontinuation of membership of Human Rights House Voronezh from the network of Human Rights Houses

⁷⁵ page 3 UN System Model Policy on Sexual Harassment

Practical recommendations and tools

5.1 How to recognise sexualised harassment – signs and boundaries of unacceptable behaviour

Sexualised harassment is any unwanted behaviour of a sexualised nature that humiliates, intimidates, or offends a person by violating their personal boundaries⁷⁶. The key criterion is that such behaviour is undesirable for the recipient, regardless of the perpetrator's intentions⁷⁷. Harassment can be verbal, nonverbal, or physical: from comments and "jokes" with sexual overtones to unwanted touching, intrusive messages of an intimate nature, or demonstration of obscene materials. Even a single rude action (for example, an offer of sexual intercourse) is unacceptable, and the systematic reproduction of inappropriate behaviour is even more indicative of harassment⁷⁸. In workplace relationships, harassment is often accompanied by a power imbalance (for example, harassment by a manager). Still, unequal status is not a prerequisite for harassment: any uninvited sexualised advances are considered a violation of professional boundaries and ethics, regardless of the participants' positions⁷⁹.

Signs of sexualised harassment can vary. Below are typical examples of unacceptable behaviour:

- Sexually suggestive emails, messages, or comments.
- Offensive "jokes", sexist remarks, or vulgar stories, making colleagues feel uncomfortable or offended.
- Intrusive compliments or comments about appearance, body, sexual orientation, or personal life that cross the line.
- Non-consensual physical acts: uninvited touching, hugging, stroking, attempts to kiss; intentional invasion of personal space.

⁷⁶ Title VII of the Civil Rights Act of 1964 | U.S. Equal Employment Opportunity Commission

⁷⁷ Ending Sexual Assault and Harassment in the Workplace

⁷⁸ What is harassment. Harassment described in simple words: Encyclopedia – Company Secret.

⁷⁹ How to combat harassment: instruction for non-profits

- Gestures, sounds, and facial expressions of a sexual nature: for example, lip licking, demonstratively looking somebody up and down, hooting, or whistling behind someone's back.
- Displaying pornographic or obscene images and videos, sexually explicit memes in work chats.
- Direct sexual offers, hints at intimate relationships, pressuring someone to get a date or intimacy with them.
- Threats, blackmail, or punishment (explicit or implied) for refusing to reciprocate sexualised attention – classic signs of “quid pro quo” harassment.

This list is not exhaustive – harassment is defined as any unwanted behaviour with sexual implications that creates a hostile or demeaning work environment. It is crucial to distinguish between acceptable friendly gestures and toxic ones: a single, careless joke may be forgiven if it is not repeated and does not carry malicious intent, but systematic comments or actions that make someone feel like an object of sexual pursuit are unacceptable. The boundary of what is unacceptable begins where the other employee's sense of safety and comfort ends. If the behaviour causes fear, shame, humiliation, or forces an individual to avoid certain people and situations, these boundaries have clearly been crossed. Organisations explicitly state in their codes that the work environment must be free of sexualised insults and harassment, and that any such behaviour is a violation and will result in consequences.

How to report a problem (ways of speaking out about harassment, considering the team's size)

Reporting incidents of sexualised harassment is important both for restoring justice and preventing further incidents. However, in the civil sector, the format and method of filing a complaint depend on the organisation's size and structure. In any case, the organisation must provide clear and safe channels for feedback; otherwise, survivors will simply remain silent: according to research, 79% of employees who have experienced sexualised harassment do not report it in the workplace. The main reasons are fear of damaging professional relationships, fear of not being taken seriously, shame, or potential career damage⁸⁰.

Organisations of under 10 people (very small teams)

Small activist groups and NGOs rarely have a dedicated HR department or a formal complaint-filing procedure. Therefore, a climate of trust and the opportunity to discuss problems informally are key. Often, a harassment incident is first discussed in a private conversation — for example, a survivor might share it with a colleague or a direct supervisor. Ideally, in such a group, informal complaints should be taken seriously and not swept under the rug. The team can agree on ground rules: respecting personal boundaries, not ridiculing complaints, and promptly addressing any tensions that arise. For example, an eco-initiative of six people entered into an oral "non-violence pact," pledging not to keep problems to themselves but to bring them up for group discussion. At regular meetings, the group openly discussed all conflicts or concerns. This openness facilitates reporting harassment, even without formal procedures. If the situation requires more drastic measures — for example, if the boundary violator is the manager or founder — a small organisation should engage an external neutral mediator. In the absence of internal resources, partner human rights organisations or communities can be contacted for assistance in reviewing the complaint. Ensuring anonymity in small groups is challenging (everyone knows everything), but online forms or anonymous questionnaires can be used to collect complaints. The key is to identify at least one trusted person in advance to whom participants can confidentially report incidents of inappropriate behaviour. This could be a

⁸⁰ page 19 Still just a bit of banter?

group member selected by consensus or an invited consultant. In a small team, success largely depends on the leader's personal example. If they openly support the survivor and make it clear that harassment will not go unnoticed, others will be more comfortable speaking up.

Organisations of 10 to 50 people (small and medium-sized)

As the team grows, informal agreements become insufficient. Medium-sized NGOs, media outlets, and initiatives should adopt elements of a formal system by establishing a zero-tolerance policy and a complaint-handling procedure. First, management should clearly state that the organisation prohibits all forms of harassment and supports anyone facing such issues. Then, it is essential to appoint an authorised individual or a commission to receive and review complaints. Small NGOs rarely have an HR department, so a trusted person (for example, an ethics advisor) or a mini-committee of employees of different genders may be the solution. These authorised individuals or groups are responsible for ensuring the confidentiality and impartiality of the complaint review process. Employees must be informed of how and whom to contact. The procedure should provide several channels to choose from: for example, notifying the direct supervisor, or immediately contacting an alternate manager, a special committee (if established), or emailing an anonymous address or a special Google form. Diversifying complaint-filing channels is especially important if the perpetrator is a supervisor; in that case, the survivor should have a way to bypass them. For example, the Belarusian Association of Journalists (BAJ) in exile introduced special regulations following the publicisation of a harassment incident. According to these regulations, two commissioners are appointed, and complaints are accepted via a closed online form and a dedicated email address (accessible only to these commissioners)⁸¹. Each complaint is registered and reviewed within 10 days, while data confidentiality and non-access of unauthorised persons are guaranteed. This is not an ideal approach, but it reflects best practices: complaints are recorded, investigated by a neutral party, and the complainant is informed of the outcome. Informal channels can also be used in medium-sized teams (e.g., discussing the issue with a trusted colleague or mentor), but they should be treated as a preliminary step only. The organisation should foster a culture in which any hint of harassment is reported up the management line⁸². For example, in international NGOs, employees are trained to report unacceptable behaviour to management. Internal policies should not

⁸¹ BAJ has approved regulations for reviewing harassment complaints

⁸² How to combat harassment: instruction for non-profits

require survivors to file a formal complaint immediately; oral and anonymous reporting methods must also be available. Moreover, no complaint should go ignored, even if it is received informally or without mentioning specific names. Also, some international NGOs use anonymous online platforms (such as Suggestion Ox⁸³, Whispli⁸⁴, EthicsPoint (NAVEX Global)⁸⁵, AllVoices⁸⁶), where employees can send messages directly to management, bypassing intermediaries.

Organisations of 50+ people (large teams)

Large civil society structures (major NGOs, international projects, media holdings) typically have formal procedures and policies, but the “distance” between management and employees is greater, and the risk of hushing up harassment cases is higher. Complaint channels must be multi-level and publicly communicated to everyone. Typically, corporate (or internal) policies state that, in cases of harassment, employees may report it to their supervisor, the HR department, the ethics/compliance department, or directly to a special commission. At least one anonymous reporting channel is required — for example, a hotline or an email trust box. Many large organisations may involve an external independent ombudsperson or a trusted individual to whom harassment can be safely reported. Importantly, all staff instructions emphasise that any retaliation against the complainant is prohibited, and employees are assured they will not face any consequences for filing a complaint. This principle is inevitably applied in practice — for example, pressuring complainants is in itself punishable by disciplinary action. Large

⁸³ Suggestion Ox is a digital suggestion box that can be adapted to handle harassment complaints. It is easy to use and accessible even for small initiatives: employees or volunteers can send a nonymous messages via a link or QR code; the administrator receives notifications and can respond confidentially.

Suggestion Ox

⁸⁴ Whispli is a specialised solution for anonymously reporting violations, including harassment. It allows employees to securely send messages and attach evidence (screenshots, documents) while maintaining anonymity. It operates as a web platform and a mobile app.

Whispli

⁸⁵ EthicsPoint (NAVEX Global) is one of the most popular international compliance reporting systems, often used by large NGOs and corporations. It supports multi-channel complaints (phone, web form), anonymity, as well as storage and analysis of complaints. For Belarusian NGOs in exile, it can be helpful as an example of a "big solution."

EthicsPoint Whistleblowing & Incident Management Software | NAVEX

⁸⁶ AllVoices is an online tool for collecting and managing employee feedback, designed to foster a transparent and safe corporate culture. The platform allows employees to anonymously report incidents of harassment, discrimination, or ethical violations, while employers receive aggregated data, track trends, and respond effectively.

Anonymous Reporting Platform | AllVoices

organisations also have strict confidentiality policies: the identities of survivors, witnesses, and accused individuals are not disclosed unless necessary. To build trust, automated or external complaint systems are often introduced. For example, some international NGOs use anonymous online platforms (such as Suggestion Ox⁸⁷, Whispli⁸⁸, EthicsPoint (NAVEX Global)⁸⁹, and AllVoices⁹⁰) where employees can send messages directly to management, bypassing intermediaries. In large organisations, it is also helpful to inform staff about the options for appealing to external bodies — workers' unions, ombudspersons, and state equality protection bodies — in case internal mechanisms fail. Transparency and communication are key: every employee should receive a handout or manual at hire that outlines whom to report harassment to and the available channels for doing so. The management of a large organisation is obliged to remind employees of this regularly and to demonstrate, by personal example, that a harassment complaint is not “airing dirty laundry” but a standard practice for protecting dignity in the workplace.

Unacceptability of retaliation and a culture of support

Regardless of the organisation's size, the prohibition on punishing or bullying complainants is an ironclad rule. Survivors and witnesses should feel safe raising the issue without the threat of dismissal, demotion, or a boycott by colleagues. Otherwise, all efforts to create a complaint channel are pointless — people will remain silent. A telling example: at one of the major Belarusian solidarity funds, the lack of a transparent ethical procedure has led to complaints against the leader accumulating to a critical degree, eventually

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Anonymous Reporting Platform | AllVoices)

culminating in a public scandal with significant reputational damage. Moreover, in such cases, a "culture of silence" often develops within the organisation, where uncomfortable questions are frequently silenced by pressuring the critics. To prevent this, the policy should guarantee protection for anyone who reports harassment in good faith. It is advisable to include in the written instructions that any pressure on the complainant is prohibited and that anyone who initiates such pressure will be punished. At the same time, a culture of trust and support must be fostered: managers should openly thank colleagues who have shown courage in reporting an issue, thus demonstrating through actions that the incident will be handled objectively and that the survivor will receive support. With this approach, employees will feel confident speaking up, knowing the organisation has their back.

External appealing channels and access to protection

Internal complaint procedures do not replace external legal remedies, but rather complement them. Survivors should have the opportunity to appeal not only within the organisation but also to external bodies — for example, independent human rights organisations, ombudspeople, professional associations, or, if necessary, law enforcement agencies. The organisation is obligated not to hinder such appeals or limit access to judicial or administrative remedies. On the contrary, the ethics policy should clearly state that the internal handling of complaints does not preclude also appealing to external authorities. Such transparency builds trust and demonstrates the organisation's commitment to accountability, and reduces the risk of being accused of covering up incidents.

How to assist survivors – algorithms for supporting colleagues who have gone through harassment

When a coworker has been harmed by harassment, it is crucial to respond appropriately and provide support. Helping the survivor involves empathetic listening, respect for their feelings, and proactive steps to restore their sense of safety. Here are some tips on how to support a colleague who has gone through sexualised harassment:

- **Be empathetic and believe the survivor.** If a colleague confides in you about a harassment incident, first listen carefully without any skepticism or judgment. Confirm that you take what you have heard seriously: i.e., with a phrase like, "Thank you for sharing this with me. What you've described is unacceptable, and it's not your fault". Even if to you personally the situation does not seem as extreme, it is essential to understand that it is traumatic for the survivor. Avoid reactions like, "Oh, come on, they were probably joking" — disparaging them will only exacerbate feelings of isolation. Express support and a willingness to help, recognising the courage it took for the colleague to speak up. Oftentimes, just a compassionate attitude ("I am on your side, you're not alone") can alleviate the survivor's distress.
- **Clarify what kind of assistance the colleague expects.** Everyone processes traumatic situations differently: some are ready to act immediately, while others feel lost and afraid. Instead of imposing your solutions, ask directly: "How can I help you now?" Perhaps all the survivor needs is the opportunity to vent and emotional support. Or maybe they need assistance with contacting HR or filing a complaint. Don't patronise them — act in their best interests by letting them take control over the situation, limiting yourself to a supportive role⁹¹. For example, you could offer: "Would you like me to go with you to a meeting with management so you don't feel as afraid?" or "If you need to gather evidence, let's take screenshots of the chats together." But it is important to respect any decision your colleague makes, even if it doesn't seem optimal to you — pressuring the survivor ("You have to complain right now!") can intensify the trauma. You are an ally, not a boss in this situation.
- **Help with information and keeping records.** Offer the survivor information on available resources. They may not know whom to contact — you can

⁹¹ How can I support a co-worker experiencing sexual harassment? | Makarem & Associates

suggest a trusted contact within your organisation or direct them to a policy section outlining the complaint-filing process. Also, offer assistance in gathering facts: for example, if you witnessed the incident, say you're willing to confirm the details if there is an investigation. If you notice a colleague is experiencing harassment but remains silent, you can discreetly document the incidents (remember or write down the dates and details) to provide witness testimony if needed. **Here is a tip:** When recording information, act ethically — do not share it with anyone other than the relevant authorities, and only with the survivor's consent.

- **Maintain confidentiality and respect privacy.** If a colleague has confided in you, do not disclose this information to others unless the survivor explicitly requests that you involve someone else. Discussing the details of the incident within the team or gossiping about it is especially unacceptable. Assure your colleague that their story is between the two of you (and any officials they choose to contact). The exception is cases of immediate danger (i.e., threats of physical violence), when you must escalate the issue immediately. In other situations, the right to decide to whom and when to report harassment rests primarily with the survivor. Confidentiality is the key to trust: by violating it, you risk losing the trust of not only the survivor but also the entire team.
- **Avoid victim blaming.** The so-called victim blaming must be taboo. Be careful that neither your words nor others' reactions imply that the person has "provoked" the harassment through their behaviour or appearance. Unfortunately, stereotypes are deeply ingrained, and colleagues may unconsciously make unempathetic remarks. **Stay objective:** if you hear someone downplaying the problem or blaming the survivor (e.g., "It's their own fault — they shouldn't be wearing short skirts"), gently but firmly object to such comments. Creating a team environment where victim blaming is not accepted is part of your support. Survivors should feel that you and other colleagues are judging the aggressor's behaviour, not theirs.
- **Speak out against toxic workplace culture.** Helping survivors is not just about responding to incidents; it is also a proactive approach that helps prevent future cases. Become **an active bystander:** when you see or hear inappropriate behaviour (sexualised jokes, inappropriate innuendo), speak up about it being unfunny and unacceptable⁹². Do not join in on the laughs at sexist jokes or engage in conversations that demean colleagues. If you notice someone on your team consistently overstepping boundaries, **bring it to management's attention** — even if you are not the directly affected,

⁹² Sexual Harassment - Equal Rights Advocates

our words may help ensure timely action. Also, do not take part in spreading rumours or gossip about harassment incidents. Instead, demonstrate your commitment to maintaining a safe and respectful environment. A **consistent zero-tolerance** for harassment from every employee creates a collective stance: such behaviour is not normal. As a result, when the survivor decides to speak out officially, they will have allies and witnesses ready to confirm the truth, which significantly increases their security.

- **To be the survivor's ally** is to actively challenge the culture of hushing up, mistrust, and fear. Being an ally is expressed not only through words of support but also through concrete actions: listening without judgment, confirming facts, accompanying the survivor to meetings if necessary, or assisting with filing a complaint. By supporting a colleague, you not only help that individual cope with a difficult situation but also help create an environment with no place for harassment. Each of us has the power to influence the norms of behaviour by demonstrating zero tolerance for violence, a willingness to intervene, and to assist those in need.

At the same time, your own boundaries are also worth remembering. The person providing support may also be experiencing stress, anxiety, or emotional burnout. If the situation becomes too difficult, discuss it with a trusted person or professional while maintaining the survivor's confidentiality. Self-care isn't selfish; it's part of responsible allyship. This view of mutual support builds trust within the team and lays the foundation for safely responding to harassment incidents.

Incident Response Checklist – Step-by-step internal procedures for handling harassment incidents

Even with the strongest preventive measures, it is impossible to eliminate the risk of harassment completely. Therefore, an organisation must have a straightforward response procedure for handling complaints and incidents of sexualised harassment. A transparent and fair process is essential both to protect survivors and ensure an objective investigation of allegations. Below is an example of a step-by-step internal procedure for handling harassment cases.

A step-by-step guide to responding to sexualised harassment complaints

1. Immediate response and ensuring security

- Register the fact of the appeal (oral, written, or anonymous).
- Contact the survivor to confirm the details.
- Make sure there is no immediate threat to anyone.
- If necessary, promptly separate the conflicting parties (i.e., transfer the accused to a different department, change the schedule, or temporarily suspend).
- Appoint an individual or group of individuals to handle the investigation (HR + lawyer, or an independent expert).

2. Primary gathering of information

- Conduct a confidential interview with the survivor.
- Ask open-ended questions: what happened, where, when, who was present, what actions or words took place, what was the complainant's reaction.
- Clarify whether they have previously spoken about what happened, and whether there have been complaints about the accused before.
- Avoid pressure and accusatory language. Give time and the opportunity to pause.
- Specify the desired outcome: punishment, transfer, apology, or guarantees of non-repetition of the unacceptable action.

3. Formulating the plan of investigation

- Make a list of witnesses and persons to be interviewed.
- Identify a list of potential evidence (messages, photographs, recordings, access logs, etc.).
- Distribute tasks among the commission members and set deadlines.
- Document the plan (who does what, when).

4. Collecting evidence and interviewing participants

- Interview witnesses individually, asking open-ended questions without revealing unnecessary details.
- Get an explanation from the accused (listen carefully, respecting the presumption of innocence).
- Collect physical evidence: chats, screenshots, security camera recordings, entry/exit logs, and, if available, audio/video.
- Check records: Have there been any complaints about this person in the past?
- Analyse the context: is there any personal animosity or conflict of interest?
- If necessary, interview former colleagues or external witnesses.

5. Documenting every step

- Keep written records of all interviews (if possible, signed by the participants).
- Keep copies of collected materials.
- Set dates, deadlines, and responsible persons.
- Use this document as a basis for reporting and analysing the efficiency of the process.

6. Confidentiality and preventing rumours

- Warn all participants about the unacceptability of disclosing details.
- Minimise the spread of information.
- Ensure that there is no pressure on the survivor (i.e., bullying, boycott).
- Provide protection from revenge (retaliation).
- If necessary, temporarily suspend the accused from managing the survivor(s).

7. Making a judgment and taking action according to the results

- Based on the collected data, the commission is making a judgment.
- If the facts are proven:
 - apply disciplinary measures (i.e., reprimand, rebuke, mandatory training, termination, etc.);
 - in case of serious violations, send the materials to law enforcement agencies.

- Communicate the decision to the accused and the survivor (to the extent appropriate while protecting privacy).
- Offer the survivor psychological support, flexible hours, or time off to recover.
- Formally apologise on behalf of the organisation and thank the survivor for their courage in reporting the problem.

8. Monitoring and concluding the case

- Check in on the situation after completing the investigation (via surveys, one-on-one conversations).
- Make sure that the incident does not recur, and new bullying does not occur.
- Analyse lessons learned: make adjustments to policies, update procedures, and conduct training.
- Compose an internal report (anonymised) and, if necessary, share the results with the team.
- Emphasise that the organisation is responding, learning, and strengthening its zero-tolerance culture.

By following these steps, the organisation demonstrates that every harassment report will be investigated thoroughly and fairly.

Basic response principles – promptness, impartiality, confidentiality, and support for survivors – must be invariably followed at every step of the process.

This approach not only enables the resolution of specific incidents but also builds employee trust: knowing that complaints will not go ignored, people are more willing to report problems, and potential perpetrators realise that consequences are inevitable⁹³.

⁹³ Fact Sheet: Discrimination and Sexual Harassment | U.S. Equal Employment Opportunity Commission

Preventive measures and the culture of respect – training programs for employees and fostering a respectful corporate culture

In the long run, harassment can only be overcome by changing people's everyday behaviour and beliefs. This is achieved through training programs and targeted efforts to develop a culture of respect within the organisation. Training increases employees' awareness of the unacceptability of certain actions and teaches them appropriate responses, while a healthy corporate culture helps to apply that knowledge in practice. Let us take a look at the key components:

- **Mandatory training for all employees (including management).**

Standards of respect should be instilled in the workplace through systematic education. International recommendations indicate that employers should regularly conduct sexualised harassment prevention training and that no one, from junior employees to senior managers, should be exempt. New employees should receive training on ethical behaviour immediately upon hire, and periodic seminars or courses should be organised for all staff (e.g., once a year or every two years, depending on applicable legislation and internal policies). These training sessions should cover topics such as: what harassment is and why it is dangerous; what actions are considered unacceptable; how to appropriately respond to witnesses and survivors; and the company's procedures for filing complaints. It is vital that the training be practical rather than a recitation of laws. Research emphasises that training should help develop skills for intervention and incident prevention, rather than being limited to legal definitions. For example, it is helpful to include role-playing exercises or situational analyses in the program: e.g., how to appropriately react to a colleague making a sexist comment; how a manager should respond to a complaint; how to tell a colleague that their behaviour is bothering you. Particular attention should be given to teaching bystander skills: the so-called model bystander intervention. International practice suggests the "5D" concept for bystanders: Distract, Delegate, Document, Delay, Direct – distract the offender, involve a third party, document the incident, support the survivor afterward, and make known that the incident is unacceptable⁹⁴. These techniques teach people not to ignore the problem and act safely and effectively. High-quality training helps dispel myths

⁹⁴ The 5Ds of Bystander Intervention - Right To Be

(e.g., "they provoked harassment themselves") and reduce prejudice. Furthermore, training is a signal from management that communicates, "We consider this issue important and are willing to invest time in employee education". It is especially important for senior managers to attend such sessions or take special leadership modules – this demonstrates their personal engagement. If resources are insufficient, you can turn to experienced donors or partners: as NGO management advises, large partner companies are often willing to share their training programs on this topic⁹⁵.

- **Fostering the culture of equality and inclusivity.** Lectures alone are not enough – new knowledge must lead to the development of new skills and behaviours. Therefore, organisations must deliberately foster a culture of respect. What does this entail? Above all, upholding values in action: declared principles (equality, dignity, safety) should be reflected in daily decisions. For example, if a company proclaims the value of transparency and open communication, management should be prepared to listen to uncomfortable feedback and discuss "difficult" topics (including sexualised harassment) without irritation or defensiveness. A good practice is to have regular conversations about the organisation's culture. These can be separate sessions or integrated into general meetings, including discussions of ethical principles, analysis of hypothetical dilemmas, and exchange of ideas on how to make the environment even safer. It is important to engage all employees so that everyone feels responsible for the workplace environment. Furthermore, diversity and inclusion must be encouraged: when a team is diverse (based on gender, age, background, etc.) and everyone feels respected for their uniqueness, the risk of discrimination and harassment reduces. DEI (diversity, equity, and inclusion) training is closely related to harassment prevention — it teaches the value of differences and eliminates the grounds for bias. For example, conversations about gender stereotypes can help employees recognise how seemingly innocent jokes can hurt colleagues of the opposite gender. By fostering a culture of respect, organisations reinforce positive behaviour: they recognise ethical interactions and thank employees who, for example, resolve conflicts tactfully or show good support for a colleague. This creates a system that not only punishes inappropriate behaviour but also rewards appropriate behaviour — this is also educational.
- **Leadership and accountability in cultural issues.** Cultural shifts are impossible without the active participation of leaders. Management should present themselves as the guardians of the organisation's values. Practical

⁹⁵ How can I support a co-worker experiencing sexual harassment? | Makarem & Associates

measures include: incorporating respectful behaviour criteria into manager performance reviews, discussing team climate issues in meetings, and appointing ethics or "culture" officers within departments. Many organisations are introducing corporate charters or manifestos. For example, in 2023, NHS England⁹⁶ adopted a "sexual safety" charter signed by all departments, in which management pledged to ensure zero tolerance for any sexual encroachments and to adhere to 10 core principles of a safe environment⁹⁷. Such documents set the tone: employees see a public commitment from management and the specific actions it entails. However, if, in practice, a manager turns a blind eye to "minor" harassment, all documents will be mere imitations of action. Therefore, the leader's primary task is personal responsibility for culture. This includes setting a personal example (never allowing themselves ambiguity or over-familiarity) and a willingness to address uncomfortable incidents openly. Managers must be trained to respond to complaints appropriately — with empathy and seriousness. Many reputable employers invest in empathy management training to help managers listen and empathise rather than dismiss employee concerns⁹⁸. Ultimately, if ordinary employees see their immediate supervisor and senior management actively supporting a healthy work environment (for example, by shutting down sexist jokes in meetings, encouraging women to share opinions, and responding to complaints informally and quickly), they develop a strong belief that "respect is the norm here." This is a robust preventive measure that does not require constant monitoring — people naturally start upholding this norm because it benefits everyone.

- **Feedback and improving the programs.** Like any program, training and cultural initiatives should be regularly evaluated. Collecting employee feedback is essential: was the training useful; what new things have they learned; what would they suggest adding to the program. It might be worth conducting a team climate survey annually: do people feel safe; do they know how to report a problem; and are they noticing progress? Such surveys can be anonymous to ensure honest responses. Programs are then adjusted based on collected data: for example, if employees report being unsure about what actions constitute harassment, this point should be addressed again in training with clearer examples. Keeping up with current research: the anti-harassment field is evolving, with new methods

⁹⁶ NHS England (the National Health Service for England) is England's public health system, providing most services free at the point of use and funded through taxation.
<https://www.england.nhs.uk/>

⁹⁷ NHS England - Supporting colleagues affected by sexual misconduct

⁹⁸ What should businesses do with remote work after the pandemic – Big Ideas

emerging, including a progressive approach with multiple response options (the "5D" approach). Organisations need to keep up with these trends: study best practices, adopt colleagues' successful strategies, and update their policies and training. For example, today, greater attention is given to training witnesses and supporting survivors than to punishing perpetrators. There is also a growing understanding that simply punishing is not enough; the factors and conditions that allowed for the incident to occur must be addressed (perhaps by revising processes, redistributing roles within the team, etc.). Therefore, training isn't limited to "here are the prohibited things" — it is embedded in the broader context of building healthy working relationships.

In conclusion, **training staff and developing a culture of respect are long-term investments in a safe work environment.**

One-off training sessions will not produce immediate results unless they are accompanied by daily efforts to change attitudes. But over time, with regularity, the organisation will achieve measurable results: fewer harassment incidents, earlier detection of problematic situations (as people will trust the system more and report them), and increased employee satisfaction and team cohesion. A workplace where everyone feels respected and protected is entirely achievable.

Personal data protection, confidentiality, and prohibition of retaliation

Handling sexualised harassment complaints always entails processing highly sensitive information: the names of survivors and witnesses, incident descriptions, sometimes even intimate photographs or correspondence, and information about physical and mental health. In European law, such information is referred to as "special categories of personal data." Their processing is regulated by the General Data Protection Regulation (GDPR). According to Article 9 of the GDPR⁹⁹, processing such data is permitted only in exceptional cases: i.e., if it is necessary to establish and defend legal claims or if it is required by law to protect employees from discrimination and violence.

GDPR presents several key principles:

- minimisation — collect only data that is truly necessary for the investigation;
- limiting access — only authorised persons can have access to the files;
- limiting storage — the data must be stored as long as it is necessary to complete the investigation;
- processing security — the data must be encrypted for storage, limiting access based on roles.

For organisations, this means:

- pre-emptively appointing a limited circle of authorised individuals, who receive complaints and carry out procedures;
- describing in the policy what data will be collected, why, and how long it will be stored;
- storing data securely (e.g., in a separate encrypted storage) and destroying "raw" files (screenshots, correspondence), as soon as the investigation is complete;
- using secure complaint-filing channels (anonymous forms, secure emails), and not regular messengers.

Besides data protection, **confidentiality and the prohibition of retaliation** are the most crucial. The European Whistleblower Protection Directive (2019/1937) explicitly requires that whistleblowers' identities be kept confidential and

⁹⁹ <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>

prohibits the disclosure of their data without consent¹⁰⁰. Any retaliatory measures — termination, demotion, suspension, boycott by colleagues — are considered unlawful retaliation. The Equal Treatment Directive (2006/54/EC) further emphasises that less favourable treatment on the basis of a person's complaint about harassment, or refusal to tolerate it, constitutes discrimination¹⁰¹. International ILO standards (Convention No. 190, Recommendation No. 206) also stipulate that governments and organisations are obliged to protect survivors, witnesses, and those reporting workplace violence from any form of retaliation¹⁰².

For organisations, this entails the necessity to:

- include zero tolerance for retaliation in the policy;
- pre-emptively establish measures to protect the complainant (e.g., temporary transfer, flexible schedule, or removal of the manager from direct supervision);
- ensure that bullying and boycott of the complainant does not occur within the team;
- provide for the possibility of appeal or independent review if the survivor has doubts about the impartiality of the process.

It is important to **distinguish between confidentiality and covering up**. Confidentiality is necessary to protect participants of the process, reduce the risk of pressure, and maintain the integrity of the investigation. However, it must not become a tool for sweeping matters under the rug. International guidelines (e.g., the Equality and Human Rights Commission's recommendations in the UK) clearly state that it is unacceptable to use non-disclosure agreements (NDAs) to prevent survivors from speaking out or contacting external bodies¹⁰³. The organisation is obligated to guarantee the right to report harassment externally (e.g., to human rights organisations or an ombudsperson) if internal channels are ineffective.

¹⁰⁰ <https://eur-lex.europa.eu/eli/reg/2016/679/oj/eng>

¹⁰¹ <https://eur-lex.europa.eu/eli/dir/2006/54/oj/eng>

¹⁰² C190 - Violence and Harassment Convention, 2019 (No. 190)

¹⁰³ Guidance - The use of confidentiality agreements in discrimination cases

Appendices

Appendix 1 Example “Contract of Conduct”

This document is an agreement between [name of organisation] (here in after referred to as "Organisation") and each of its employees/volunteers/participants (hereinafter referred to as "Participant"), aimed at creating and maintaining a safe, respectful, and inclusive environment free of any forms of sexualised harassment, discrimination, violence and other unacceptable forms of behaviour.

1. Obligations of the organisation

Organisation is obligated to:

1. Foster a safe environment

- Develop and implement a zero-tolerance policy toward sexualised harassment and discrimination.
- Ensure that all employees and participants are familiarized with said policy.

2. Provide secure complaint-filing channels

- Appoint no less than two trusted individuals tasked with handling complaints (including outside of the direct management line).
- Provide anonymous and confidential ways of complaining.

3. Respond to incidents

- Conduct a timely, impartial, and confidential investigation of each case.
- Take response measures proportionate to the severity of the violation, with no regard for the position or status of the perpetrator.

4. Protect from retaliation

- Guarantee that no complainant, witness, or participant of the investigation will be sanctioned or harassed.

5. Provide training and information

- Conduct regular training on anti-harassment, ethical interaction, and safe communication for all participants.

6. Demonstrate leadership

- Senior management is committed to leading by example and demonstrating a commitment to the principles of respect, safety, and equality.

2. Obligations of employees and participants

Every Participant is obligated to:

1. Refrain from any form of harassment and discrimination

- Respect colleagues' personal boundaries.
- Avoid any words, actions, or hints that could be interpreted as sexualised harassment.

2. Adhere to the rules of interaction

- Maintain a respectful tone both in offline and online interactions.
- Do not use demeaning or discriminatory expressions.

3. Report inappropriate behaviour

- If you have witnessed or gone through an incident, notify a trusted person or report it via an established channel as soon as possible.

4. Support survivors

- Provide moral support to colleagues who have gone through harassment, but do not share confidential information.

5. Participate in training

- Take part in all mandatory training and introductory sessions on anti-harassment.

6. Cooperate during investigations

- Provide correct and factual information if needed; do not hinder the complaint-handling processes.

Signatures of the parties:

On behalf of the Organisation:

Participant:

(name, surname, position, date, signature)

(name, surname, date, signature)

Appendix 2

Chart “Responsibility → Concrete measure → Example of implementation” (for training and adapting for different organisations)

Party	Responsibility	Concrete measure	Example of implementation
Organisation (as a structure)	Fostering a safe environment	Development and implementation of a zero-tolerance policy toward sexualised harassment	The policy is posted on the website, sent to all employees and volunteers
	Providing secure complaint-filing channels	Appointing a minimum of two trusted persons + an anonymous form for complaints	Trusted persons' contact information is included in the policy; the form is posted on the internal portal
	Responding to incidents	Conducting an investigation within 14 days of receiving the incident	The investigation is conducted by an independent commission of 3 people with no connection to the accused
	Protection from retaliation	Any sanctions against complainants and witnesses are prohibited	If the complainant receives threats or pressure, the organisation immediately intervenes
	Education and information	Mandatory training for all participants no less than once a year	Conducting an interactive online course and an in-person workshop
	Demonstrating leadership	Management's public commitment to anti-harassment principles	The director's annual appeal to the team and a publication on the website

Participants

Party	Responsibility	Concrete measure	Example of implementation
Participants	Refraining from harassment	Avoiding words, actions, or hints of a sexualised nature	Avoiding jokes, touches, or comments on people's appearance
	Adhering to the rules of interaction	Maintaining a respectful tone in all interactions	Not interrupting, not using demeaning expressions
	Report violations	Notifying a trusted person or using an anonymous channel	Messaging via an online form with witnesses of the incident present
	Support survivors	Providing moral and informational support	Accompanying the survivor to the meeting with a trusted person
	Participate in training	Participating in all mandatory training	Attending an online course and signing a confirmation of completion
	Cooperate during investigations	Providing accurate information, assisting in establishing facts	The witness answers the commission's questions and hands over the correspondence

Appendix 3

Public commitment template

Outlined below is an example of a short public commitment that a Belarusian NGO in exile could post on its website or include in its internal documents. This template is universal and suitable for various types of organisations — human rights initiatives, NGOs, media projects, or activist groups:

Commitment to Maintaining a Safe and Respectful Environment

Our organisation is committed to a zero-tolerance approach to sexualised harassment and any forms of violence or discrimination. In alignment with this, we publicly pledge to:

- **Create a safe space:** Provide a work and volunteering environment free of sexualised harassment, offensive language, and any forms of unacceptable behaviour. Every member of our organisation — employee, volunteer, or partner — has the right to respect and safety.
- **Prevent abuse:** Implement and regularly update policies and procedures to prevent sexualised violence. We provide training on ethical behaviour, emphasising everyone's responsibility to maintain a respectful environment.
- **Encourage reporting issues:** Ensure confidential, safe, and accessible channels for complaining or reporting incidents of harassment or violence. No one will be penalised for reporting a problem in good faith; in fact, such actions will be encouraged to ensure everyone's safety.
- **Respond fairly:** We will promptly and impartially review all incoming complaints. If violations are confirmed, we will take fair action against those responsible, including expulsion from the organisation, while providing support to survivors.
- **Ensure accountability:** Regularly inform our team and community about the steps we are taking to maintain a safe environment. We welcome feedback and external audits of our practices to continually improve them.

Present commitment is endorsed by the organisation's management and applies to everyone without exception. Managers have a special responsibility to demonstrate respectful behaviour by personal example. We believe that only through joint efforts can we create an environment in which everyone feels protected and respected.