



**Department of Neurobiology, Care Sciences
and Society (NVS)**

**Routine for preventing and dealing with harassment, sexual harassment,
victimisation and retaliation at the Department of Neurobiology, Care
Sciences and Society (NVS)**

2 (7)

Introduction	3
Prevention of harassment, sexual harassment and victimisation.....	3
Routine for dealing with harassment, sexual harassment and victimisation	4
Overview of the routine	4
Investigation procedure responsibility	5
Duty to investigate and take measures	5
Manager investigates	5
In-depth investigation	6
The in-depth investigation is carried out as follows:.....	6
Risk assessment and measures	6
Examples of measures that may be taken following an investigation:	7
Monitoring.....	7
Documentation.....	7
Incident-reporting system.....	7
Support for managers.....	7
Support for employees	8
Safety and trade union representatives	8
Staff support and occupational health services.....	8
Dealing with harassment, sexual harassment, victimisation, discrimination and retaliation, where the perpetrator is the manager.	8
Investigation responsibility.....	9

3 (7)

Introduction

At Karolinska Institutet (KI) and the Department of Neurobiology, Care Sciences and Society (NVS), all areas of activity shall be characterised by a good physical, organisational and social study and work environment that is free from discrimination, victimisation, harassment, sexual harassment and retaliation. In these matters, KI and the NVS have a zero tolerance policy.¹ If a manager at NVS becomes aware that someone considers themselves to have been subjected to harassment, sexual harassment, victimisation, discrimination or retaliation, he/she has a duty to investigate and, where appropriate, take reasonable measures to ensure that it ceases and does not recur. Even other employer representatives (for example, the manager of a different division) also have a duty to act upon becoming aware of the incident. Those with such a duty should, in consultation with the individual who made the report, inform their immediate manager, who can then initiate an investigation.

This document is addressed to managers at NVS.

Prevention of harassment, sexual harassment and victimisation

Prevention work aims to reduce the risk of harassment, sexual harassment or victimisation. Prevention also includes that you as a manager has the knowledge and is prepared how to act if it happens. The main risk factors for harassment, sexual harassment and victimisation are at the organisational level. Examples of organisational conditions of importance to pay attention to are workload, division of labour, the conditions for cooperation and the risk of conflicts.² The individual risk factors that may exist are mainly relevant if there are also organisational risks present. Similarly, in a well-functioning organisation, individual risk factors are less likely to lead to harassment, sexual harassment or victimisation.³

At each division, the organisational prevention measures include ensuring that collaboration works, that work is well organised, that workloads are reasonable and that it is clear who does what. Systematic work-environment management enables any problems to be identified and dealt with early on. It is important to hold continuous discussions about the organisational and social working environment and also to clarify what zero tolerance of harassment, sexual harassment and victimisation means in the activities for which you, as a manager, have responsibility. This should be clarified at least annually in the context of performance management dialogues

¹ Guidelines concerning discrimination, harassment and victimisation, reg. no. 2-38/2018: https://medarbetare.ki.se/media/130385/download?_ga=2.169501409.1943617882.1662970373-1469113354.1662970371

² Organisational and social work environment (AFS 2015:4Eng), provisions

³ Guidelines for managing social health risks at work – victimization and bullying, Swedish Agency for Work Environment Expertise

or in a joint meeting with all employees. Such a meeting is a good opportunity to inform your employees of the contents of this routine.

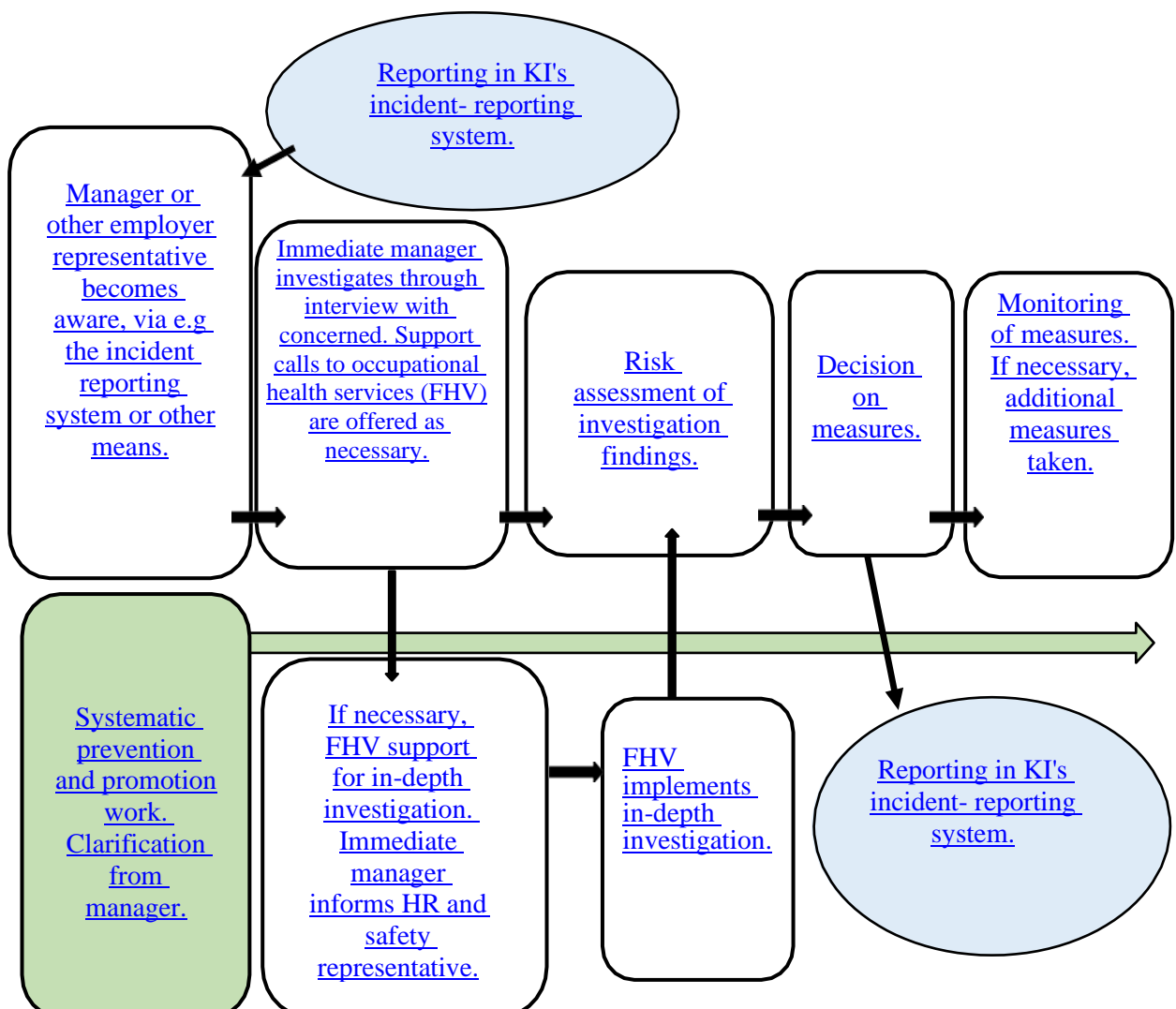
Trust-based leadership at KI states that we should trust and support employees' initiative, creativity, autonomy and competence. In line with this, prevention at individual level can be about promoting participation, showing appreciation/giving feedback and offering continuing professional development, thus fostering a stimulating working environment. More targeted and tailored interventions to reduce the risks of harassment, sexual harassment and victimisation may also be needed depending on the individual circumstances of the person. Examples of such interventions can include support in communication, cooperation and conflict management or awareness-raising and boundary-setting regarding jargon or rude behaviour.

The following section describes the different steps in the routine for how NVS managers should act in the event of knowledge of, or signs of, harassment, sexual harassment or victimisation.

Routine for dealing with harassment, sexual harassment and victimisation

Overview of the routine

Click on the respective link below to access the appropriate section of the document.



Investigation procedure responsibility

Immediate managers are responsible for investigating any incident and for contacting HR, occupational health services and safety representatives as necessary.

Duty to investigate and take measures

If an employee shows signs of or claims to have been subjected to any form of victimisation or harassment, the employer must investigate the matter as soon as possible and interview the individuals involved. Investigation should be carried out as quickly as possible, partly because it is stressful for the victim if the process is delayed, and partly because the possibility of ending the violations is greater if the manager acts as early as possible.

The purpose of an investigation is to clarify the circumstances of the incident(s). The investigation is an important basis for deciding what measures to take to stop the behaviour and prevent it from happening again.

In addition, the investigation should, if necessary, form the basis for any labour law sanctions (such as a warning or a deduction from wages).

Manager investigates

To begin with, the manager shall:

1. Interview the person(s) who feels they have been exposed. Take notes regarding what was said in the interview and summarise these, making sure that you both share an understanding of your conversation. Agree on what information may be presented to the person concerned by the report and thus may be included in the investigation documentation available to all parties involved. Make clear to the employee that what is said will be kept confidential. If access to case documentation is requested, a confidentiality assessment must always be carried out. However, KI's confidentiality decisions can be appealed by the Administrative Court of Appeal, regarding which you as the manager should inform (for more information, see section below on documentation).
2. In some situations, it may be necessary to take interim measures immediately, while the investigation is ongoing, in view of the organisational and social working environment for all involved. An example of an interim measure could be to directly separate people who should not work together during the course of the investigation.
3. Interview the person(s) concerned by the report. Present what the person making the report has agreed may be presented (see above point). Clarify for the person(s) concerned by the report that there is zero tolerance of victimisation, harassment and sexual harassment.
4. Offer support at the occupational health services to both parties if needed.

If, after conducting an investigation through interviews, a manager decides that there is a problem with collaboration or conflict, for example, [a risk assessment is made of the interview findings and the manager takes the necessary measures.](#)

In-depth investigation

If a manager, after investigation through interviews, considers that harassment, sexual harassment or victimisation may be involved, the manager is responsible for ensuring that an in-depth investigation is carried out by an external, independent party. At NVS, we use occupational health services in these cases.

The in-depth investigation is carried out as follows:

1. The manager informs those concerned that an in-depth investigation will be carried out by the occupational health services.
2. Request a registration number from KI's registry to register the investigation.⁴
3. If the person concerned has previously declined to participate in a support dialogue with the occupational health services, this may now be offered again.
4. The manager informs HR and the safety representative regarding the in-depth investigation. HR is a support in the continuing process.
5. The manager, in consultation with HR, contacts occupational health services for support in carrying out the investigation. Initially, occupational health services makes an inventory of the current situation, problems, course of events, previous interventions and effects. After that, a plan for the in-depth investigation is made.
6. The occupational health investigator will contact those concerned and inform them of the investigation process and arrange individual interviews.
7. The occupational health investigator talks to the person who feels that he or she has been exposed and to the person concerned by the report. The investigator may also need to obtain additional information, for example from other employees.
8. The investigator provides feedback to the manager on the findings of the investigation and suggests any further interventions. The manager then calls on HR support and, if necessary, occupational health to plan further action.

Risk assessment and measures

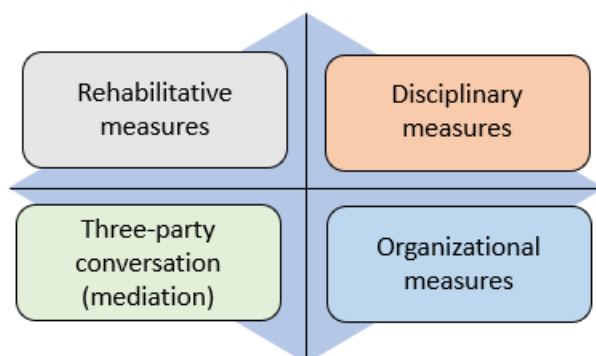
After an investigation has been carried out by the manager or in-depth investigation by occupational health services, a risk assessment is made of the findings of the investigation. The following, for example, should be considered in a risk assessment:

- how long it has been going on,
- how often it has occurred,
- opportunities for cooperation,
- who might be affected.

The manager then decides what measures to take. In cases of harassment, sexual harassment or victimisation, managers should coordinate measures with HR and their superior, and if necessary, with occupational health services. Measures may be required at both individual and group/organisational level depending on the findings of the investigation.

⁴ Guidelines concerning discrimination, harassment and victimisation, reg. no. 2-38/2018: https://medarbetare.ki.se/media/130385/download?_ga=2.169501409.1943617882.1662970373-1469113354.1662970371

Examples of measures that may be taken following an investigation:



Monitoring

Managers must ensure that the unwelcome behaviour has ceased by monitoring the measures and speaking with the person(s) concerned. It is also important to make sure that the vulnerable employee feels that they have received the support they need. Take further measures if problems persist.

Documentation

Managers are responsible for documenting investigations. The documentation is, inter alia, the basis for decisions on measures. As the documentation may be subject to confidentiality, it must be treated confidentially. In cases where HR and/or occupational health services have provided support, they may also need to receive the documentation. If so, managers should inform the employee(s) concerned. For more information on the handling of documentation during and after an investigation and possible registration, see "Guidelines concerning discrimination, harassment and victimisation"⁵.

Incident-reporting system

Reporting in our incident-reporting system should also be done so that we can work systematically to prevent something similar from happening again. Managers should therefore encourage the employee to make a report via the system.

The employee can also ask the safety representative to make the report. At NVS, it is received and can be seen by the immediate manager and HR at NVS. Employees can also report incidents anonymously via the incident-reporting system. If the report is made anonymously, there is a risk that the investigation may be hampered by lack of information.

Support for managers

It is important that managers contact HR or their immediate superior if they need support, as it can be difficult to get all the perspectives and circumstances without help. Managers can also turn to Staff support and/or KI's occupational health services, which includes management counselling, for advice on how to handle the situation.

⁵ Guidelines concerning discrimination, harassment and victimisation, reg. no. 2-38/2018: https://medarbetare.ki.se/media/130385/download?_ga=2.169501409.1943617882.1662970373-1469113354.1662970371

Support for employees

Managers should make clear to the employee what further contact channels are available for support.

Safety and trade union representatives

Employees who feel they have been exposed can seek support from a safety representative or trade union representative.

Staff support and occupational health services

Employees can also contact the telephone counselling via Staff support.

Counselling is available 24 hours a day and you can remain anonymous.

Employees can also contact occupational health services directly to book up to two anonymous visits.

Dealing with harassment, sexual harassment, victimisation, discrimination and retaliation, where the perpetrator is the manager.

If an employee feels subjected to harassment, sexual harassment, victimisation or reprisals by a manager, it is the responsibility of that manager's manager to investigate the incident, in accordance with the NVS delegation rules⁶.

The Discrimination Act prohibits employers from discriminating against employees on the basis of gender, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age. Harassment related to any of the grounds of discrimination and sexual harassment are two forms of discrimination. Other forms of discrimination are: direct or indirect discrimination, inadequate accessibility and instructions to discriminate.

The Discrimination Act also protects anyone who has reported discrimination, harassment or sexual harassment from possible punishment, as the law prohibits retaliation. The protection also applies when someone has participated in an investigation under the Discrimination Act or has refused or acquiesced in harassment or sexual harassment.

NVS takes very seriously any situation in which a manager has, or may have, subjected an employee to harassment, sexual harassment, victimisation, discrimination or reprisals. In these cases, the head of department and the administrative head must always be informed. The measures that may be taken in these cases aim to ensure that the behaviour stops and to prevent it from happening again. For information on possible legal

⁶ Rules of delegation at the Department of Neurobiology, Care Sciences and Society (NVS), reg. no.: 1 - 16 / 2021

sanctions, see KI's guidelines on discrimination, harassment and victimisation.⁷

Investigation responsibility

If an employee becomes aware that he or she may have been subjected to harassment, sexual harassment, victimisation, other forms of discrimination or reprisals by his or her manager (or another employer representative), the incident must be investigated. The investigation must be carried out promptly, objectively and fairly. The course of investigation, risk assessment and action is the same as in the above routine.

The responsibility for the investigation is as follows:

- The manager's manager, supported by the HR manager, is responsible for investigating the matter. The head of department and the administrative head must be informed.
- If the matter concerns the head of department, the dean is responsible for investigating with the support of the HR manager.

⁷ Guidelines concerning discrimination, harassment and victimisation, reg. no. 2-38/2018:
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