



# Harassment and Bullying in the Workplace

Fiji Women Lawyers Association

CLE September 2023

Presenters Hon Dr Robyn Layton AO KC and Ms Susan Serukai



ADB

# Objectives of the CLE presentation

**Raise awareness:** by providing information about the issues of sexual harassment and bullying in the workplace. Information to be provided and discussed includes:

- the ILO Convention C 190 on Violence and Harassment which has been ratified by Fiji;
- the meaning of the various forms of harassment and bullying in the workplace;
- the relevant Fijian laws and policies;
- sharing international experience about the prevalence and impact of sexual harassment and bullying in the legal profession and legal sector

**Discussion about ways to address and promote a safe and Inclusive workplace** in accordance with C 190 which includes core elements of:

- prevention;
- effective prohibition;
- protection for the victim;
- appropriate sanctions against the offender and remedies for the victim
- responsive assistance and services for the victim

**Discussion about addressing the challenges of sexual harassment and bullying** including encouraging workers to speak up if they witness or experience harassment or bullying and the importance of reporting these incidents.

**Delivery of the CLE** will include 3 Sessions with detailed power points as well as case studies enabling group off line and online discussion

# Sessions to be covered

1

- International Conventions
- Overview ILO C 190 and Recommendation 260
- Meaning of various forms of Harassment and Bullying in the workplace

2

- Importance of employers conducting workplace risk assessments
- Impact of Harassment and Bullying in legal sector workplaces internationally

3

- Comparison of Fiji Laws and policies with ILO C 190 and R 260
- Effective strategies to create a respectful work environment

- Case studies for group discussion between Sessions 2 and 3

# Session 1

## Topics

1. International Conventions
2. Overview ILO C 190 and Recommendation 260
3. Meaning of various forms of Harassment and Bullying in the workplace

## Topic 1

# International human rights norms on violence and harassment at the workplace

ILO Convention C190  
Violence and Harassment  
Convention, 2019

ILO Recommendation 260  
Violence and Harassment  
Recommendation 2019

ILO Convention 111  
Discrimination in Employment  
and Occupation

International Convention on  
the Elimination of All Forms of  
Discrimination against Women  
(CEDAW)

## ILO Convention 2019 C190 – Purpose

*Violence and Harassment at work can constitute a human rights abuse, they are a threat to equal opportunities, unacceptable and incompatible with decent work*

# Ratification Status of C 190

- Currently 32 States (countries) have ratified the Convention
- Fiji ratified C 190 on 25 June 2020
- Fiji's First Report on its implementation in law and practice is already due
- An example of the scrutiny given by the ILO Committee on the Application of Conventions and Recommendations (CEACR) and the interpretation of the Convention is indicated in the CEACR Direct Request made to Uruguay in 2023 after it had filed its First Report (see reference final slide)

# Topic 2

## Overview ILO C190

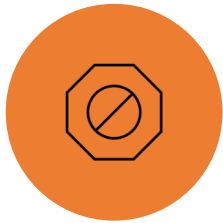
### Structure of ILO C 190

- 8 Parts – 6 Parts are relevant to this CLE
- Part I Definitions
- Part II Scope of persons protected
- Part III Core Principles
- Part IV Protection and Prevention
- Part V Enforcement, Remedies and Assistance
- Part VI Training and Awareness- raising

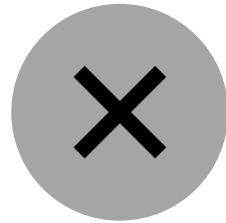




# 5 Core elements to address workplace harassment – good practice requirements



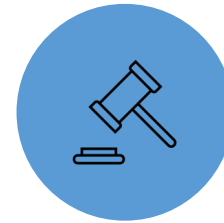
1 PREVENTION



2 PROHIBITION



3 PROTECTION



4 REMEDIES



5 RESPONSIVE  
ASSISTANCE



# Topic 3

## Meaning of various forms of harassment and Bullying

# Overview - Sexual harassment, Harassment, Discriminatory Harassment and Bullying in the Workplace



- **Sexual Harassment** behaviour that is unwelcome or offensive either implied or overt and includes:
  - demands or requests for sexual activity
  - Physical, verbal, non-verbal conduct of a sexual nature including gestures or showing materials of a sexual nature
  - Harasser's intentions are irrelevant if a reasonable person would anticipate it likely that the acts of a sexual nature would be offensive to the recipient.
- can be a single act



- **Harassment** unacceptable behaviour or practices or threats that aim at or result in or is likely to result in physical, psychological, (sexual) or economic harm
  - Harasser's intentions are irrelevant if a reasonable person would anticipate it likely that the acts would result in harm to the recipient
  - Does not have to be repeated and can be a single act, particularly if a serious act



- **Discriminatory harassment** unacceptable behaviour or practices or threats that is directed to or affects persons of a particular prohibited characteristic such as sex, gender, gender orientation, age or which disproportionately affects persons with that characteristic
  - Harasser's intentions are irrelevant if a reasonable person would anticipate it likely that the acts would result in harm to a person or persons
  - Does not have to be repeated and can be a single act
  - Sexual harassment is generally discriminatory harassment



- **Bullying** a form of harassment when a person (or group) repeatedly behave unreasonably towards a person (or group) and
  - The behaviour creates a risk of health and safety including risk of physical, psychological or economic harm
  - Intentions of the person bullying are irrelevant if a reasonable person might regard behaviour as unreasonable in the circumstances
  - Requires repetitive behaviour

# Barriers & causes of Harassment & Bullying in the Workplace

Not just another OHS issue

Concerns human rights, discrimination and equality

Affects not only victims who work at a workplace but other persons who are in and around the workplace, family and community

Underlying causes **include** mindsets, stereotypes, social, cultural and religious attitudes

Sometimes due to ignorance or lack of awareness by offenders and victims

Need to recognise barriers to complaint and power imbalances

Employers have not only legal duties but duties of care

## Fiji Laws and Policies relevant to Harassment and Bullying in the workplace

**Employment Relations Act 2007 Part 13** parties are required to make an effort to address the matter through the internal grievance procedures provided by the employer. If unsuccessful, the employee can escalate the issue to mediation. If still unresolved it can be referred to the Employment Relations Tribunal.

**National Policy on Sexual Harassment in the Workplace 2008** serves to clarify and expand upon the interpretation and implementation of sexual harassment (SH) within the workplace.

**Human Rights Commission Act 2009** resolves or investigates complaints of “unfair discrimination” which includes “harassment” on prohibited discrimination grounds and also “sexual harassment” in the context of “employment”

**Crimes Act 2009** s212 and s213 indecent assault and indecently insulting or annoying any person

# Sexual Harassment behaviour

Sexual Harassment includes creating an intimidating, hostile or offensive environment where sexualised behaviour by conduct or words or materials pervades the workplace environment

- Sexual harassment may take many forms
- Any gender can sexually harass and be harassed
- Determined from the perspective of the person feeling harassed
- Harasser's intentions are irrelevant, what matters most is its effect on another person
- Sexual harassment may involve a one-off incident, or a pattern of conduct or grooming a person over time to accede to sexual advances or conduct
- Mutual attraction or consensual friendship is not sexual harassment

# Sexual Harassment | Further Examples

- Hand touching, embracing or kissing a person
- Sharing sexually suggestive emails, text messages or information
- Discussions about sexually explicit material or using sexual innuendo
- Not respecting personal physical boundaries (body touching or moving or standing inappropriately close)
- Making suggestive statements or comments about a person's appearance/dress
- Asking personal or intrusive questions of a personal nature unrelated to work
- Leering or staring

- Offering inappropriate gifts of personal or intimate nature
- Direct or implied propositions, or requesting dates
- Asking about a person's sexual history or sexual activities
- Direct or implied requests for sexual favours
- Promises of reward or threats of repercussions if sexual favours are or are not provided
- Persistently requesting to engage in social activities out of the usual work environments, work activities or work hours

Good example of Law - *Sexual Harassment of Women at the Workplace (Prevention, Prohibition and Redressal) Act 2013* India together with a Handbook published by the Indian Government. ( See reference).

# Harassment | Examples

**Making insulting or derogatory remarks or jokes based on personal characteristics**

**Criticising a person's accent or communication style**

**Making physical gestures that are offensive or insulting**

**Asking intrusive and irrelevant questions about a person's background or family**

**Results in or is likely to result in physical, psychological, or economic harm to the recipient**

**Does not need to be on a prohibited ground although often harassment will be related to a prohibited discriminatory ground or amount to bullying (discussed next)**





# BULLYING

Meaning of bullying in a workplace

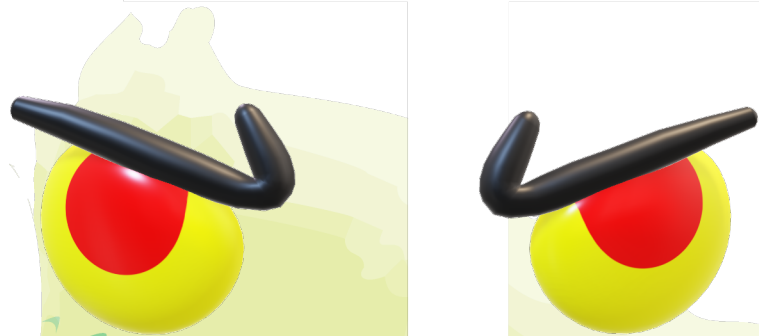
Nature and forms of bullying behaviour

Specific features about bullying



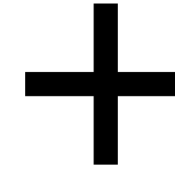
“unacceptable behaviours and practices” - ILO C 190

includes “bullying” although not so named



# Bullying

.a person (or group) repeatedly behaves unreasonably towards a person (or group),



behaviour creates a risk of health and safety including risk of physical, psychology or economic harm

**Behaviour** = actions which are victimising, humiliating, intimidating or threatening

**Unreasonable** = whether a reasonable person might regard the behaviour as unreasonable in the circumstances

It is not solely a subjective test

# FEATURES OF BULLYING

## Intention

Bullying can be unintentional or unconscious behaviour that results in risk of harm to the victim

## Frequency

The most accepted international definitions refer to “repeated” behaviour or ongoing behaviour

## Subjectivity

importance is attached to the victim's perception but the behaviour must be regarded as “unreasonable” in all the circumstances, including gender

## Directionality

Abuse can be either **downwards** (eg supervisor to staff) or **upwards** ( staff to supervisor) or **horizontally** between peers.

# Forms of bullying in the workplace

## FORMS OF BULLYING

- Physical acts
- Verbal acts
- Manipulation
- Victimisation
- Micromanagement
- Social exclusion

## DIFFICULTY OF PROOF

- Subtlety of behaviour may result in the victim being uncertain as to whether they are bullied
- There may also be no witnesses.

## Examples which are not bullying behaviour

- making decisions about poor performance
  - taking disciplinary action
  - directing and controlling the way work is carried out
- provided** management action is done in a reasonable way



# Bullying differs from discrimination

1

**Bullying behaviour does not need to be because of a person's race, religion, sex et cetera**

2

**- Bullying behaviour does not need an adverse outcome to a person (such as being fired or demoted in work),**  
**- Instead bullying needs to "create a risk to health and safety" of the person.**

# Example of legislative definition of bullying

“ Workplace bullying occurs when an individual or group of individuals **repeatedly** behaves **unreasonably** towards a worker or a group of workers at work and the **behaviour creates a risk to safety and health.** **Reasonable management action** conducted in a reasonable manner does not constitute workplace bullying “

- **Source: Australian *Fair Work Act* sub-ss 789FD(1) and (2)**

# Session 2

## Topics

1. C 190 and the importance of employers conducting a workplace risk assessment and relevance for Fiji
2. Discussion of Harassment and Bullying in legal sector workplaces internationally



**Topic 1**  
**ILO C190**  
**importance of**  
**“workplace risk**  
**assessments”**

C 190 requires **employers** to undertake **“workplace risk assessments”** by

- identifying and assessing the risks of violence and harassment including psychosocial hazards and risks in that workplace

**and**

- taking measures to prevent and control them with participation of workers (C 190 Arts 8 + 9 and R 260 Art 8)

**Sectors of increased risk** often involve third parties (customers, clients, service providers, users, patients and the public) and working in isolation or remote places or intimate spaces.



## Matters to Highlight for Fiji – Different work sectors

The restricted definitions and scope of “worker”, “workplace” and “employment” in Fiji legislation and the National Policy on Sexual Harassment do not take account of “workplace risks” in e.g., the following sectors:

- the **health sector** with patients, visitors and contractors
- The **education sector** at every level including schools and universities where there are students, contractors and visitors
- The **entertainment or hospitality sectors** with customers, contractors and members of the public
- The **legal sector** where there is interactions between lawyers and legal firms, physically and technologically, a court environment with judges and staff, conferences, training sessions and social interactions

## Topic 2

# Harassment and bullying in the legal sector

- 1. International Surveys and data** on prevalence and types of sexual harassment in the legal system
- 2. Australian Surveys and data** on sexual harassment and bullying in the legal profession and South Australian Equal Opportunity Commission **Review of Harassment in the South Australian Legal Profession 2021**
- 3. Responses in Australia to sexual harassment and bullying in the legal sector**

**1. International Bar Association Us too?**  
**Report 2019** (see refence) reveals some common themes that even though legislation, policies and complaint mechanisms were in place

Internationally in the legal profession

- 1:3 women and 1:14 men were sexually harassed
- 1:2 women and 1:3 men were bullied
- 75% of cases of SH were not reported
- 57% of cases of bullying were not reported.

2. South Australia South  
Australian Equal  
Opportunity  
Commission *Review of  
Harassment in the  
South Australian Legal  
Profession 2021*

Surveyed more than 600 legal practitioners

**Prevalence**

- 42% of lawyers experienced SH and some more than once.
- 56.6 % were women 13.6% men
- 69% did not report SH

**Types of Sexual Harassment reported**

- 67% Sexually suggestive comments or jokes
- 47.7% inappropriate staring and leering etc,
- 47.4% intrusive questions
- 43.9% touching, hugging, kissing, hand on knee
- Balance included requests and pressure for sex, or dates , pictures, gestures, indecent exposure sexually explicit emails sms voice mail etc.

**The offenders included**

- 53% senior lawyer from same office,
- 30.5% lawyers from another firm or barristers' chambers
- 27.2% line manager or supervisor
- 20.4% peer level at office
- 18.3% client or witness
- 12.9% Judicial officer
- Balance others including person more junior

- '[I] did not think that anything would happen so there was no point in complaining';
- 'lack of confidence in protocols';
- 'little perceived benefit in reporting sexual harassment';
- 'on the one occasion I did I found myself ostracised and then made redundant';
- fear of repercussions;
- 'concerned about negative repercussions for their career; and they were concerned their reputation would be negatively affected';
- '...loose career opportunities ... be ostracised ... demoted ... transferred'
- 'fearful that our industry will continue to punish, in some subtle way, those who make public claims against their employers';
- 'absolutely no way that I want to be labelled a trouble-maker. Making a complaint makes me the problem and could prejudice my career'
- feelings of embarrassment, guilt, shame, trauma, and stigma
- thought that complaining would be considered a 'weak female' response'



## Reasons for not reporting – Australian Surveys

# Legal sector factors relevant to bullying

## External Organisational factors

- Competitive environment
- Male dominated in senior positions

## Internal Organizational factors

- Rigid hierarchical structures
- Power imbalances with individuals able to assert discretionary power
- Culture of workers viewing others as rivals rather than colleagues
- Bullying and harassment being used to strengthen position in hierarchy

## Individual factors

- Reluctance of victims to complain for fear of victimization

# Bullying | Examples

## Examples of Bullying Most Relevant to the Court or Legal Environment

Sources: Australian Federal case law; High Court of Australia Justices Policy on Workplace conduct; and Family Court Judicial Workplace Conduct Policy

Communicating verbally by shouting and/ aggressive or disrespectful written communication

Belittling, humiliating, insulting behaviour and put downs, particularly in front of others

Teasing, practical jokes or banter that has the effect of unreasonably offending or excluding a person(s)

Spreading misinformation or malicious gossip

Social exclusion from work-related activities, or ignoring a person in the workplace

Imposing unreasonable work demands or constantly changing demands or deadlines, micro-management or setting a person up for failure



## Further Examples of bullying – lawyers context

- **Victimisation**
  - Adversely targetting a person
  - Unconstructive criticism
  - Group mobbing
- **Micromanagement and manipulation**
  - Senior practitioners or partners excessively supervising and controlling more junior practitioners giving them limited autonomy.
  - Using a more powerful position to make demands,
- **Social exclusion**
  - One of the most common workplace bullying behaviours
  - Can be ignoring or failing to include a person in a social activity
  - Victims feel a lesser part of the workplace

### 3. Responses in Australia within the legal profession and judiciary

More than 20 Surveys undertaken in relation to the legal profession in Australia has resulted in the “**National Model Framework Addressing Sexual Harassment for the Australian Legal Profession** December 2021” published by the Law Council of Australia (See reference)

Also, **Judicial Workplace Conduct Policies** across all courts, Federal and State, and all levels from Magistrates up to the High Court of Australia

# Session 3

## Topics

1. Comparison of Fiji Laws and Policies with ILO C 190 and Recommendation 260
2. Effective strategies to create a respectful working environment regarding Harassment and Bullying in the workplace



Topic 1  
Comparison of Fiji laws and National  
Policy on Sexual harassment with the  
Provisions of ILO C 190 and R 260

# 1. What conduct can be claimed?

## ERA & NP S4

- Limited to **sexual harassment**
- Does not include harassment and violence more generally
- Requires the conduct to have a detrimental workplace effect, noting that detrimental effect includes the creation of a work environment that affects a worker's physical, emotional or mental health and well-being.

## HRCA S19(1) &(2)

- Applies to unfair discrimination which includes **harassment based on prohibited discrimination grounds** such as gender, gender orientation, age, and disability
- Also applies to **sexual harassment** for the purposes of the Act constitutes harassment '

## ILO Art 1(1)

- Has a broad definition of "violence and harassment"
- refers to a "range of unacceptable behaviors and practices or threats"
- the conduct does not require a workplace effect – but must aim at or result in or likely to result in physical, psychological, sexual or economic harm
- Includes gender-based violence and harassment – directed to or affecting persons of a particular sex/gender disproportionately

## 2. Who can claim?

### ERA & NP S4

- Worker “means” a person employed under a contract of service and includes
  - apprentice
  - learner
  - domestic worker
  - part – time worker ime
  - casual worker

### HRCA Ss 4&19

- Any person** (victim) who has been differentiated adversely or harassed by any person (offender) “while the (offender) has been involved in the area of...“employment “ which includes—
- (a) the employing of an independent contractor;
  - (b) the relationship between a person for whom work is done by contract worker pursuant to a contract and the person who supplies that worker;
  - (c) employment in the public service, including the Fiji Police Force, the Fiji Prisons Service and the Republic of Fiji Military Forces;
  - (d) unpaid work
  - Note the scope of the person who can claim is much broader that ERA

### ILO Art 2(1)&(2)

- ILO protects “workers or other persons in the world of work, including employees as defined by national law as well as persons working irrespective of their contractual status ”
- in addition to those persons referred to the ERA and HRCA) C190 includes:
  - persons in training
  - terminated workers,
  - volunteers,
  - job seekers/applicants
  - informal workers

# 3. What is the scope of the workplace

## ERA & NP S4

- Limited by the word “means”
- “any place” “building or structure” including a “ship, vehicle or aircraft”
- “where workers are required to perform the contract of service”
- The definition of sexual harassment amplifies this to include where workers are gathered for a work-related purposes including social activity

## HRCA S4

- No reference to workplace but refers to a person (offender) being involved in ... “employment” which includes—
- (a) the employing of an independent contractor;
  - (b) the relationship between a person for whom work is done by contract worker pursuant to a contract and the person who supplies that worker;
  - (c) employment in the public service, including the Fiji Police Force, the Fiji Prisons Service and the Republic of Fiji Military Forces;
  - (d) unpaid work
  - Noting that HRCA is potentially broader than the ERA

## ILO Arts 3

- Takes a different approach- it is based on the connection between “violence and harassment” and “the world of work”
- It applies to acts “occurring in the course of or linked with or arising out of work” in the workplace being public or private or places where worker takes a break etc
- The broader scope of workplace is highlighted by reference to acts during work related trips, training, events, communications, and commuting to and from work
- The causal connection to work must still be demonstrated but is not as limited as the ERA

# 4. Against whom can a claim be made?

## ERA & NP S4

- Limited to employer, employer's representative or co-worker
- "Employer" is defined as meaning a corporation, company, body of persons or individual by whom a worker is employed under a contract of service
- In summary both the victim and the offender against whom a complaint is made must be in the same employer organization /body or be the employer

## HRCA

- A claim can be made against a person who is in "employment" as defined by the HRCA S4
- In summary the employment context for a claim is provided by the offender who must be either an employer or an employee or be in one of the various employment descriptions set out in S4

## ILO Arts 2(1)&(2), 3

- employers are not defined
- "workers" are defined and they are covered if the violence or harassment occurs "in the course of , linked with or arising out of work"
- In summary the claim can be made by any person (victim) against any person (offender) so long as the behaviour occurs in "the world of work" and it can be a claim against either an employer or a worker



# 5. What complaint processes are available?

## ERA & NP Part 13 Ss 109-113

- Submit a grievance to the employer according to the agreed grievance procedure in the worker's contract of employment or if none, then Schedule 4 ERA
- all grievances "must" be referred to "Mediation Services" (under MOL) except where there is an "internal appeal system" which must be first exhausted.
- ERA S 110 (1) (b) refers also to a "grievance panel" and where possible to include women on the panel.
- If still unresolved, referred to the Employment Relations Tribunal.

## HRCA Part 4 Ss 28-34

- Complaint to the Commission about unfair discrimination
- Commission has discretion to investigate the complaint and can defer, or discontinue
- Commission investigation process includes notification to person being investigated and the procedures are private
- Commission to call a conciliation conference before commencing the investigation process
- Commission has the same powers as a High Court Judge re attendance and examination of witnesses and production of documents
- If Commission finds the complaint has substance then it must act as conciliator to settle the complainant

## ILO Art 10

- Requires provision of appropriate safe, fair, effective "**dispute resolution mechanisms**" including **investigation** procedures and dispute resolution **at the workplace level** as well as **dispute resolution mechanisms external to the workplace**
- **Dispute resolution** mechanisms are broader than investigation processes and "mediation".
- Dispute resolution mechanisms include decision-making by third party whereas mediation is a solution agreed to by and between parties with the assistance of a third party

# 6. What sanctions & remedies are available?

## ERA & NP S 230

- The Employment Relations Tribunal or the Employment Relations Court may order: **reinstatement** to former position or one no less advantageous; **reimbursement** of wages or monies lost; **compensation** for humiliation, loss of dignity, and injury to feelings; **payment** for loss or benefits or personal property
- These or other similar sanctions or remedies could be negotiated during a mediated settlement.

## HRCA Ss 37-42

- Proceedings Commissioner may take **civil proceedings in the High court** as may the complainant on conditions
- High Court can provide remedies which include: **declarations; restraint order; damages and other relief.**
- High Court can award **damages for pecuniary loss; expenses** incurred; loss of benefit monetary or non-monetary; **damages** for humiliation, loss of dignity, and injury to feelings
- High Court has power to **order interim order to preserve the position of the parties** pending investigation or final determination

## ILO C 190 Art 10 R 260 Art 14

- Provides for **additional remedies to ERA**
- Right to **resign** with compensation
- **Reinstatement**
- **Right to remove themselves from the work situation**
- **Compensation – damages for illness or injury and incapacity to work**
- **Other “appropriate and effective remedies”**
- **Sanctions** (this would include for example a fine)
- **orders requiring measures with immediate executory force to be taken to ensure that certain conduct is stopped or that policies or practices are changed**

# 7. What response assistance can be given?

## ERA & NP S4

- **Nothing referred to** in the ERA or the NP but support services or arranging for counselling or medical treatment could be agreed at a mediated resolution.

## HRCA

- **Nothing referred to** but potentially support services or arranging for counselling or medical treatment could be agreed at a conciliation or settlement process

## ILO C 190 Art 10 & R 206 Art 17

- Support and services include:
- Support for victim to re-enter the labour market
- Counselling and information services
- 24 hr hotlines
- Emergency services
- Medical care and treatment and psychological support
- Legal, social medical and administrative support for victims

## Topic 2

# Effective strategies to create a respectful working environment regarding Harassment and Bullying in the workplace

- Development of a Handbook to guide implementation of Harassment and Bullying in particular Sexual Harassment
- The need for bespoke policies or guidelines for particular sectors such the legal profession to take account of the risks of Harassment and Bullying
- Include guidelines on conducting investigations which are gender sensitive and include training for those conducting investigations, mediations and conciliation processes.
- The need to consider power imbalances of participating parties particularly on SH
- Guidelines to include what arrangements can be made to protect both parties pending and during investigation or other processes.
- Guidelines for employers to provide suitable response systems to support victims
- The definition of worker to be expanded to include more categories
- The law to provide for inspection and monitoring of employers for the content and application of their SH policy (S 76 ERA)
- OTHERS?

# References

- **Law Council of Australia (2021). National Model Framework Addressing Sexual Harassment for the Australian Legal Profession**  
<https://lawcouncil.au/files/pdf/policy-statement/22%2012%2022%20-%20P-%20National%20Model%20Sexual%20Harassment%20Framework%20December%202021.pdf>
- **Law council of Australia (2020) National Action Plan to Reduce Sexual Harassment in the Australian Legal Profession**  
[https://lawcouncil.au/publicassets/4c3d5a37-b744-eb11-9437-005056be13b5/National%20Action%20Plan%20to%20Reduce%20Sexual%20Harassment%20in%20the%20Australian%20Legal%20Profession\\_FINAL.pdf](https://lawcouncil.au/publicassets/4c3d5a37-b744-eb11-9437-005056be13b5/National%20Action%20Plan%20to%20Reduce%20Sexual%20Harassment%20in%20the%20Australian%20Legal%20Profession_FINAL.pdf)
- **ILO Convention 190** [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)
- **ILO Recommendation 260** [https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:R206](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R206)
- **ILO C 190 and R 260 at a glance** [https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/briefingnote/wcms\\_738114.pdf](https://www.ilo.org/wcmsp5/groups/public/---dgreports/---gender/documents/briefingnote/wcms_738114.pdf)
- **UN Women and ILO (2019) Handbook Addressing violence and harassment against women in the world of work.**  
[https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-ankara/documents/publication/wcms\\_731370.pdf](https://www.ilo.org/wcmsp5/groups/public/---europe/---ro-geneva/---ilo-ankara/documents/publication/wcms_731370.pdf)
- **Government of India. 2015. Handbook on Sexual Harassment in the Women at Workplace 2013. New Delhi.**  
<https://wcd.nic.in/sites/default/files/Handbook%20on%20Sexual%20Harassment%20of%20Women%20at%20Workplace.pdf>
- **India Sexual Harassment at the Workplace (Prevention, Prohibition and Redressal )Act 2013** <https://www.iitk.ac.in/wc/data/Sexual-Harassment-at-Workplace-Act.pdf>
- **ILO Direct Request Uruguay C 190**  
[https://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100\\_COMMENT\\_ID,P13100\\_COUNTRY\\_ID:4318097,102876](https://www.ilo.org/dyn/normlex/en/f?p=1000:13100:0::NO:13100:P13100_COMMENT_ID,P13100_COUNTRY_ID:4318097,102876)
- **South Australia EOC Review of Harassment in the south Australian Legal Profession 2021**  
<https://www.equalopportunity.sa.gov.au/documents/reviews/Final-Report-of-the-Review-of-Harassment-in-the-South-Australian-Legal-Profession.pdf>
- **National Policy 2008** <https://www.employment.gov.fj/resources/laws/PolicyonSexualHarassmentinWorkplace2008.pdf>
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Thank you