



PREVENTION AND ACTION PROTOCOL FOR SEXUAL HARASSMENT, GENDER-BASED HARASSMENT, OR HARASSMENT BASED ON GENDER IDENTITY OR SEXUAL ORIENTATION AT BC3

UPDATED NOVEMBER 2024



CONTENT

1. Contextualisation and mission statement	3
2. Scope and areas of application	4
3. Definition of harassing behaviour	5
4. Who can report harassing misconduct	9
5. What can I do if I am being harassed and unsure about activating the protocol?	10
6. To whom can I report if I am being harassed or know of a case?	11
7. What happens once harassing misconduct is reported	11
8. What precautionary measures may be applied during the procedure?	14
9. What sanctions may be applied in the event of harassment?	15
10. Training	22
11. Communication strategies	22
12. Monitoring and evaluation	23

1. CONTEXTUALIZATION AND MISSION STATEMENT

Harassment—whether it is sexual harassment, gender-based harassment, or harassment based on gender identity or sexual orientation—is a serious issue. BC3 initiated this work process in 2020, establishing a framework for protection, support, and prevention in such cases. This process was characterised by its participatory approach, involving staff, the Equality Group, as well as the Centre's Scientific Directorate and Management, in defining the elements of the protocol and identifying misconduct considered as harassment. It emphasises the importance of an organisational culture based on the principles of safety, dignity, and equality.

Between December 2023 and March 2024, BC3 undertook a new phase of protocol updates to further strengthen its policies against sexual, gender-based, and gender identity/sexual orientation harassment. This process began with a detailed review of the existing protocol, aiming to understand its current scope, suggested preventive and corrective measures, and its accessibility to staff.

In January 2024, a specific questionnaire was designed and distributed to BC3 staff to capture their perceptions, experiences, and suggestions regarding the protocol. This made the protocol an open and anonymous tool that encouraged frank and confident expression. Responses to the questionnaire, along with an internal process involving Centre Management and the Gender Focal Point, facilitated the integration of new perspectives and the updating of the protocol. This collaborative effort has not only strengthened the document itself but also reaffirmed BC3's commitment to equality and the well-being of its work community. It has established updated measures for the protection of harassed individuals, supported the strengthening of harassment response strategies, and enhanced the prevention of harassment.

The updated protocol, resulting from this process, underscores the importance of fair treatment and a fair hearing for those accused of harassment, reinforcing BC3's commitment to developing confidential processes. This commitment reflects a comprehensive approach that promotes an organisational culture rooted in the values of safety, dignity, equality, and appreciation for the variety and diversity of all BC3 members.

Although this protocol primarily focuses on harassment related to gender, gender identity, and sexual orientation, it also adopts an intersectional perspective.

This means that it recognises how gender is intertwined with other dimensions such as age, origin, religion, and disability, among others. However, it is important to clarify that the protocol does not specifically address other types of harassment based on religion, ethnicity, disability, or place of origin, as these aspects require a more detailed analysis and approach. Nonetheless, the protocol considers the intersection of these variables with gender issues, thereby broadening its scope and effectiveness.

2. SCOPE AND AREAS OF APPLICATION

This protocol shall apply to any person employed by BC3, regardless of their contractual situation¹, and to any harassment that may occur in the following areas:

- At the workplace and during working hours, whether physically or digitally present, as well as when traveling to or from BC3, provided it occurs during working hours.
- Harassment on mission, i.e., when travelling to a different location than usual to carry out an activity for the Centre. BC3 contributes to promoting safe missions through its travel policy.
- Harassment perpetrated through communication technologies provided by BC3 (e.g. email, slack, WhatsApp workgroup, LinkedIn, Facebook, X -Twitter-).

¹ Types of contractual relationship: Internship agreement, temporary contract, open-ended contract, collaboration contract

3. DEFINITION OF HARASSING BEHAVIOR

Harassment is considered to be any behaviour that generates an atmosphere of hostility, intimidation, or humiliation for the person being harassed. It is important to emphasise that under current legislation, harassment is understood to exist even if the act does not need to be repeated or explicitly rejected by the victim. It is considered harassment as long as it can be attested from the victim's behaviour that such misconduct is unwanted.

We believe it is essential to distinguish behaviours that constitute harassment from those that do not. For this, it is crucial to analyse the context in which they occur, as an important part of this definition relates precisely to the context. Several characteristics differentiate harassment from a relationship in which teasing or flirting can occur in a healthy way:

HEALTHY BEHAVIOR	HARASSING BEHAVIOR
It is mutual, all parties voluntarily participate in the conduct.	It is one-sided. It is unwanted, unreasonable and offensive.
Increases self-esteem and confidence.	weakens self-esteem and self-confidence.
It is desired by both parties.	Only one of the parties wants it.
It makes people feel good.	It is humiliating and insulting.
It's fun.	It is annoying.
It makes your day.	Contaminates the work environment.
Respects personal boundaries.	Does not respect personal boundaries.

This protocol specifically regulates harassing misconduct based on the following:

1. Gender-based harassment:

Behaviour aimed at reinforcing traditional gender norms that define how to be a woman and how to be a man, punishing the questioning of these gender norms and the exercise of new models.

An example of this type of harassment would be ridiculing people who assume tasks traditionally undertaken by the other sex. For instance, ridiculing a man who reduces his working hours to take care of his children while his partner, a woman, continues with a full working day, or labelling a woman as a bad mother because she increases her workload and has to travel regularly for an important project while her partner, a man, takes care of the children.

2. Sexual harassment:

Any behaviour that involves unwanted sexual topics. An example of such harassment would be the display of genitalia.

3. Harassment on the basis of gender identity or sexual orientation:

This is directed at people whose gender does not align with the one they were assigned at birth and/or who have a gender identity or sexual orientation different from that assigned at birth. It is also directed at people who feel attraction (emotional, romantic, or sexual) to people of the same gender and/or sex. It is intended to punish what the harasser considers a transgression of normality. An example of this would be spreading rumours about a person's sexual orientation and making jokes about it.

Understanding that it is difficult to foresee every possible harassing behaviour, attempting to create a comprehensive list of all such behaviours is not only impossible but could also be counterproductive. This is because we might overlook some types of harassment that are not specifically mentioned, which could result in them not being adequately addressed.

Thus, the behaviours listed in the following table—which were elaborated during the participatory process carried out at BC3 in 2020—are intended as guidelines. However, any behaviour not listed here but assessed as harassment by the specialised service managing the protocol, and accepted by the Scientific Directorate and Management, may also be considered harassment. These bodies will be responsible for deciding the measures or sanctions to be adopted:

TYPE OF CONDUCT	EXAMPLES
VISUAL	<ul style="list-style-type: none"> • Watching someone in a way that makes them feel uncomfortable because of obvious desire. • Insistently looking at body parts such as the chest, genitals or buttocks. • Showing images with sexual content to others. • Making vulgar or sexual gestures. • Showing intimate body parts to others without their consent. • Watching or spying on someone without their knowledge. • Making fun of someone for performing activities that are traditionally associated with the opposite gender.

TYPE OF CONDUCT	EXAMPLES
VERBAL	<ul style="list-style-type: none"> • Repeatedly insisting on asking for appointments or meetings outside of the workplace, even after having received a no for an answer. • Asking questions about someone's intimate or sexual life, causing discomfort. • Making comments with sexual intentions. • Making sexual jokes or comments. • Whistling at someone in an inappropriate manner. • Making sexual comments or innuendoes about a person's physical appearance. • Making indirect sexual suggestions. • Spreading rumors or gossip about someone's sex life. • Pressuring someone for sexual favors, even when it has already been refused. • Using affectionate nicknames inappropriately. • Giving compliments in a rude or sexual manner. • Making negative comments about someone's gender, sexual orientation or gender identity. • Calling someone repeatedly without their consent or for irrelevant reasons. • Issuing comments that create a negative distinction based on a person's gender, gender identity, or sexual orientation. • Making constant remarks about things like someone's hairstyle or clothing, especially if they are made persistently or are accompanied by other behaviors that suggest ulterior motives. • Showing a lack of sensitivity to gender issues or acting in an arrogant manner. • Making jokes or comments about a person's supposed intellectual inferiority or limited abilities based on gender, gender identity, or sexual orientation.
WRITTEN	<ul style="list-style-type: none"> • Sending unwanted love notes, including those sent through Social Networks. • Sending any type of pornography, including those sent via of Social Networks (ICT). • Send suggestive notes, including those sent through Social Networks.

TYPE OF CONDUCT	EXAMPLES
CONTACT	<ul style="list-style-type: none"> • Violating personal space. • Patting any part of the body that may be considered inappropriate by the person receiving it. • Grasping any part of the body that can be considered to be inappropriate by the person receiving it. • Pinching any part of the body that may be considered inappropriate by the person receiving it. • Caressing any part of the body that can be considered as inappropriate by the person receiving it. • Kissing any part of the body that may be considered inappropriate by the person receiving it. • Hindering a person's movement by seeking physical contact with your body.
POWER	<ul style="list-style-type: none"> • Using the formal or informal hierarchical position to request appointments or sexual relations.
THREATS	<ul style="list-style-type: none"> • Quid pro quo. • Threat of job loss if consent for any act is not given. • Block or accelerate access to benefits, contacts or projects.
FORCE	<ul style="list-style-type: none"> • Rape. • Physical aggression. • Use of physical superiority (height, build, etc.) to dominate another person in any way.

4. WHO CAN REPORT HARASSING MISCONDUCT

1. The person/s who suffer/s harassment.

This harassment can be perpetrated either by a specific person(s) (interpersonal harassment) or by the environment (environmental harassment).

2. Anyone who knows that a case of harassment is occurring.

It is important that every BC3 employee is committed to creating an egalitarian work environment, which is why indirect reporting is encouraged. In such cases, the specialised service will contact the harassed person and inform them that the situation has been reported.

During this interview, the different options available will be assessed and, if the person being harassed agrees, the procedure will continue.

If the person being harassed does not wish to continue with the process, either because they do not consider themselves to be harassed or because they are afraid of the possible consequences, their wishes will be respected. However, any concerns, doubts, or fears they may have will be discussed during the interview.

If the specialised service assesses that the case is significant enough for BC3 to intervene to prevent future situations, either against the currently harassed person or any other individual, the procedure may continue even without their consent. In such cases, it will be clearly indicated in the report that their participation in the process is declined.

5. WHAT CAN I DO IF I AM BEING HARASSED AND UNSURE ABOUT ACTIVATING THE PROTOCOL?

Sometimes, even if we are being harassed, it is difficult to face a process that involves other people intervening. Officially reporting harassment is always an option, but even if you choose not to do so, it will not influence the credibility of the facts if you decide to activate the protocol. There are certain actions you can take while deciding whether to report.

Remember: you do not need to expressly reject the aggressor's behaviour for it to be considered harassment. None of these actions are necessary to activate the protocol.

1. If you feel able and believe it is safe and will not worsen the problem, you can ask the person harassing you to stop, making it clear that their behaviour is unwelcome. If you do this in writing, keep a copy.
 2. You can try talking to other people at BC3 about what is happening to you; you may not be the only person experiencing it, and you could join forces.
 3. Consult the Gender Focal Point and request information about the process. This consultation will be confidential and will not activate the protocol unless you choose to. With the information you receive about regulated behaviours, the steps to follow, and the consequences of the process, you will decide whether to initiate the procedure. Only if the Gender Focal Point assesses that the situation poses a risk to the rest of the BC3 staff will they be able to act independently, in a preventive manner, without your consent.
- Keep a record of events: Whether or not you have tried the above steps, if the harassment
4. continues and you are still unsure about reporting it, having a written record of who harassed you, what happened, when it happened, and whether there were any witnesses, will make it easier for you to decide whether to proceed with a report.

Remember: you can activate the protocol at any time; it does not have to be immediately after an incident.

6. TO WHOM CAN I REPORT IF I AM BEING HARASSED OR KNOW OF A CASE?

If you are suffering harassment, believe that a situation causing you discomfort could be harassment even if you cannot name it, or know that a situation of harassment is occurring in the areas described in this protocol, you have three options:

1. Contact BC3's Gender Focal Point² and request that the protocol be activated.
2. Contact the service in charge³ of managing the protocol to initiate the process.
3. Contact BC3's Information Channel anonymously and confidentially, where complaints or information on specific cases are received.

7. WHAT HAPPENS ONCE HARASSING MISCONDUCT IS REPORTED

At BC3, the protocol management service is outsourced to specialised personnel. This team is responsible for conducting initial interviews with the person reporting the case and for carrying out the investigation, which may include talking to both parties directly involved and others who can provide relevant information. Based on this investigation, the team drafts recommendations on how to act in each situation, which are then presented to BC3 management for a final decision on actions or sanctions to be implemented.

Individuals can access this service directly or through the Gender Focal Point.

² BC3 Gender Focal Point (Susana Pérez): susana.perez@bc3research.org. Telf: 747 416 414 / 94 401 46 90 (ext.176). Schedule: Monday to Thursday: 9:00 - 17:00 and Friday: 9:00 - 14:00

³ Specialised external service (Sortzen Consultoria SL) acosconsulting@sortzen.org . Telf: +34 747 406 576 / +34 944 057 379 Opening hours: Monday to Friday 8:00 to 17:00

Once the specialized service receives the information about the case, either verbally or in writing, it will contact the person reporting the case and an interview will be arranged within a period not exceeding **3 working days**. In this interview, the service staff will collect in writing the initial account of the facts and will verify that it is a situation related to gender, with sexual connotations or related to gender identity or sexual orientation, without specifying for the moment if it is a situation of harassment or not. This report should include the identification of the person being harassed, the person reporting the harassment - if different from the victim - and the harasser, unless it is an environmental harassment. The facts, incidents and possible witnesses to the harassment should be described in as much detail as possible. This account of the facts should be signed by the person reporting.

If the reporting person is not the one being harassed, the specialised service will summon the harassed individual to provide their version of the facts and indicate whether they wish to initiate the procedure. If they choose to proceed, they must sign the account of the facts they provide. If the person does not wish to proceed, the process will stop, but the information collected so far will be recorded in the protocol's records. If the specialised team assesses that the situation poses a risk not only to the person being harassed but also to the rest of the staff, it may propose preventive measures related to the case.

Once it has been verified that the reported situation corresponds to what is regulated in this protocol, the victim of harassment will be informed about the three pathways through which they can continue the process:

1. Environmental harassment procedure:

When the harassment does not occur directly from one person to another, but consists of behaviour that generates a hostile, intimidating, or humiliating climate for the staff in general (for example, sexist jokes like "How do women get to management positions? From below and on their knees," or discriminatory comments like "A woman is better prepared to organise this event because you men can't do more than two things at the same time"), the measures proposed by the specialised service will focus on sensitisation and/or awareness-raising and will be addressed to the entire staff of the Centre. This process will have a maximum duration of **7 calendar days, which may be extended by 3 days in exceptional cases**.

2. Informal procedure or complaint:

When it is considered that the harassment can be resolved through negotiation or mediation with the person against whom the complaint is filed. This is a faster procedure than the formal one and aims to resolve the situation outside official channels.

This process will have a maximum duration of **7 calendar days, which may be extended by 3 days in exceptional cases**.

During this procedure, the specialised service will conduct a confidential interview with both the victim and the person against whom the complaint is filed. The person filing the complaint may be present if they choose, and the accused person may provide any explanations they deem appropriate. This process aims to establish a history of the facts, compare the impressions of both parties, and gather potential solutions they may wish to provide. The accused person will be informed of the possible consequences if formal proceedings are initiated. An agreement will be reached with the parties to change the behaviour of the harassing person to eliminate the harassing situation. The Scientific Directorate and Management will be informed of this decision.

If either party does not agree with the measures proposed by the service and/or the behaviours recur, formal proceedings may be requested.

3. Formal proceeding or complaint:

When the seriousness of the case does not allow for mediation/negotiation or when one of the parties involved in an informal proceeding is not satisfied with the resolution and requests a formal investigation process be opened.

The initiation of this formal procedure within the Centre does not prevent the harassed person from going to the Labour Inspectorate, the Social Security, or the courts at any time during the procedure. However, if they choose to pursue these external avenues, the internal procedure will be paused until a resolution is received.

This process will have a maximum duration of **10 calendar days, which may be extended by 3 days in exceptional cases**. During this time, the specialised service will conduct a confidential interview with the harassed person and, if deemed necessary, propose precautionary measures to the Scientific Directorate and Management to ensure the well-being of the complainant. Subsequently, an interview will be held with the reported person to hear their version of the facts. The service may call as many witnesses as necessary and access the Centre's facilities if required for the investigation. Once the process is complete, the service will prepare a proposal for disciplinary measures to be submitted to the Scientific Directorate and Management, who will make a decision within a **maximum period of 10 days**. Both the complainant and the accused may be accompanied by a person of their choice throughout the process. These accompanying persons will not participate in the interviews or provide testimony; their role will be to offer emotional support.

The specialised service will consider the explicit request of the complainant when choosing a pathway, but may take a different decision if its assessment warrants it. If the service determines that the event is more serious than assessed by the complainant, it may choose a different procedure; and vice versa.

BC3 will at all times ensure that neither the persons reporting an event nor those acting as witnesses suffer retaliation for doing so. In cases where the allegations are not substantiated, BC3 will ensure the accused person is rehabilitated. If it is shown that the accuser or any witness has acted in bad faith against the person about whom the complaint and/or allegation is made, appropriate disciplinary action will be taken against the person responsible.

On a quarterly basis, the Equality Group belonging to the HR Excellence process will be provided with a report of statistical data on the cases dealt with, enabling them to assess the evolution of the protocol. These reports will be confidential and anonymous, without disclosing personal data of either the harassed person or the alleged harasser, and will be used solely for the aforementioned purpose.

8. WHAT PRECAUTIONARY MEASURES MAY BE APPLIED DURING THE PROCEDURE?

If there is sufficient evidence of harassment, precautionary measures may be taken. These will depend on the circumstances, and their advisability and feasibility will need to be assessed:

- Separating the harassed person from the aggressor: A change of job and/or shift may be implemented, preferably for the aggressor, and only if no other option is possible, for the harassed person. This precautionary measure may be proposed either by the specialised service or by any of the parties involved.
- Establishing follow-up and control guidelines to ensure that the harassment situation is not repeated.
- Providing the harassed person with the medical, psychological, and/or legal support they may require through coordination with the care services already in place in the three historical territories of the Basque Autonomous Community.
- BC3 is committed to following up on the complaint and will take preventive measures to avoid the recurrence of similar situations.

9. WHAT SANCTIONS MAY BE APPLIED IN THE EVENT OF HARASSMENT?

The behaviours regulated in this protocol will be classified on a spectrum⁴ according to six categories, with some examples provided that do not represent all possible forms. It must also be noted that, depending on the context and the analysis carried out by the specialised service, a behaviour may be reclassified from one level to another. Therefore, this categorisation is not fixed:

1. Generally non-offensive behaviors:

For example, everyday comments about things such as hairstyle and clothing: "I like your new haircut" or "You look good in that colour." These will not normally be considered offensive comments, although accompanying circumstances may make them so. For instance, nonverbal manifestations such as lewd gestures or laughter accompanying the comments or a habitual and unnatural repetition of these comments may cause them to fall into another category.

2. Uncomfortable / Moderately offensive behaviors:

For example, comments and actions that imply or insinuate unfavourable distinctions based on gender: "We can no longer speak freely when there are women around," "You men only think about sex," "He's not a real man, he can't take a joke," etc.; or sending unwanted poems or love notes, including those sent through social networks.

3. Offensive behavior:

For example, gender insensitivity or overbearing behaviours; paternalistic, derogatory, or exclusionary behaviours; insinuations that family responsibilities distract women from professional practice; gaslighting their discomfort with phrases like "You're imagining it" or "You're exaggerating"; ridiculing people who take on tasks traditionally assumed by the other sex; using "affectionate" nicknames; making lewd comments; making irrelevant and unwanted phone calls; making comments that imply or insinuate unfavourable distinctions based on gender, gender identity, or sexual orientation; spreading rumours or gossip; making sexual jokes or comments; or making comments with a sexual double entendre.

⁴ Adapted from "The Spectrum of Sexual Misconduct at Work (SSMW)" Kathleen Kelley Reardon (2018).

4. Highly offensive behavior:

For example, intentionally denigrating behaviour or comments: comments about physical attributes used to insult; jokes about a person's intellectual capacity or limited abilities due to their gender; asking about personal or sexual life, generating discomfort; offensive compliments; spreading sexual rumours or gossip about another person; sexual comments or insinuations about a person's physical appearance; or sending suggestive notes, including those sent through social networks.

5. Overt misconduct:

For example, rude or physically invasive behaviour: looking a person up and down in a sexually suggestive manner; grabbing, pinching, patting, or fondling a person in an unwelcome way; kissing someone without their consent or beyond a standard greeting; ignoring someone's disinterest in a personal or intimate relationship and continuing to insist; rude jokes that denigrate people based on their gender, identity, or sexual orientation; suggesting that a woman is using her gender to advance her career; sending any type of pornography, including through social networks; leering; repeatedly looking at breasts, genitals, or buttocks; displaying images of sexual content; spying; insistently asking for dates; making obscene gestures; or violating personal space.

6. Gross misconduct:

For example, conduct involving coercion, sexual abuse, sexual harassment, sexual assault, or aggression: rubbing or squeezing against someone in a suggestive manner; explicit or implicit threats of career damage if sexual relations are not maintained or sexual misconduct is not engaged in; rape; threats to block or offers to accelerate access to benefits, contacts, or projects in exchange for sexual contacts; quid pro quo; use of physical superiority (height, complexion, etc.) to dominate another person in any way; displaying genitals; or using formal or informal hierarchical positions to solicit dates or sexual relations.

BC3, in the absence of an agreement, and applying Articles 45, 54, and 58 of ROYAL LEGISLATIVE DECREE 2/2015, of October 23, which approves the revised text of the Workers' Statute Law, establishes that:

1. The following penalties may apply to Level 1 and 2 misconduct:

- Verbal warning.
- Written reprimand.
- Suspension of employment and pay for up to 2 days.

2. The following sanctions may apply to Level 3 and 4 misconduct:

- Written reprimand with warning.
- Suspension of employment and salary from 3 to 15 days.

3. The following sanctions may apply to Level 5 behaviors:

- Suspension of employment and salary from 16 to 60 days.
- Temporary disqualification for promotion for a period of up to 3 years.
- Disciplinary dismissal.

4. The following sanctions may apply to Level 6 misconduct:

- Disciplinary dismissal.

There are also penalties for false accusations. A false accusation is defined as any accusation made with knowledge of its falsity and/or manipulation of the truth, with the intent to harm the accused. For an accusation to be considered false, it must first be demonstrated that the alleged incident did not occur and second, that it was made in bad faith with the intention of harming the other person's interests. It must also have been filed against a specific and identified person, mentioning their name and surname, and following the channels set out in this protocol.

The following penalties may apply to false reports:

- Suspension of employment and salary from 16 to 60 days.
- Disciplinary dismissal if they are repetitive.

This table indicates the sanctions that could be applicable to each type of harassment behaviour. However, as indicated above, sanctions may vary depending on the context in which the behaviour occurs and the assessment of the facts made by the specialised service and the Scientific and Management Departments.

GRADUATION	EXAMPLES	SANCTIONS
Generally non-offensive behaviors	<p>Everyday comments about such things as hairstyle and dress: "I like your new haircut" or "You look good in that color. Usually not be considered offensive comments although the accompanying circumstances may make them so</p> <p>Daily comments accompanied by:</p> <ul style="list-style-type: none"> • Nonverbal manifestations such as lewd gestures or laughter. • A habitual and unnatural reiteration. 	<ul style="list-style-type: none"> • Verbal reprimand. • Written reprimand. • Suspension of employment and pay for up to 2 days.
Uncomfortable / Moderately Offensive Behavior	<ul style="list-style-type: none"> • Comments and actions that imply or insinuate unfavorable distinctions based on gender: "We can no longer speak freely when there are women around", "you men only think about sex", "he's not a real man, he can't take a joke" etc.. • Sending unwanted love notes, including those from the sent through Social Networks. 	<ul style="list-style-type: none"> • Suspension of employment and pay for up to 2 days.
Offensive behavior	<ul style="list-style-type: none"> • Gender insensitivity or overbearing behavior. • Paternalistic, derogatory or exclusionary behavior. • Insinuations that the family is a distraction to women's professional practice. • Gaslighting their discomfort "you're imagining it", "you're exaggerating". 	<ul style="list-style-type: none"> • Written reprimand with warning. • Suspension of employment and salary from 3 to 15 days.

GRADUATION	EXAMPLES	SANCTIONS
Offensive behavior	<ul style="list-style-type: none"> • Ridiculing people who take on tasks traditionally assumed by the other sex. • Use "affectionate" nicknames. • Make lewd comments. • Making irrelevant and unwanted phone calls. • Comments that imply or insinuate unfavorable distinctions based on gender, gender identity or sexual orientation. • Spreading rumors or gossip. • Making sexual jokes or comments. • Making comments with a sexual double meaning. 	
Highly offensive behavior	<p>Intentionally demeaning behavior or comments:</p> <ul style="list-style-type: none"> • Comments on physical attributes used to insult. • Jokes about a person's intellectual capacity or limited abilities because of their gender. • Asking questions about personal or sexual life, generating discomfort. • Offensive compliments. • Spreading sexual rumors or gossip about another person. • Sexual comments or innuendoes about a person's physical appearance. • Sending suggestive notes, including those sent through the Social Networking. 	
Obvious misconduct	<p>Rude or physically invasive behavior:</p> <ul style="list-style-type: none"> • Looking a person up and down in a sexually suggestive manner. 	<ul style="list-style-type: none"> • Suspension of employment and salary from 16 to 60 days.

GRADUATION	EXAMPLES	SANCTIONS
Obvious misconduct	<ul style="list-style-type: none"> Grabbing, pinching, patting, or stroking a person of the same sex unwelcome. Kissing someone without them wanting or expecting it (beyond a standard greeting). Ignoring someone's disinterest in a personal or intimate relationship and continue to insist. Crude jokes that denigrate people because of their gender, identity and sexual orientation. Suggest that a woman uses her gender to advance her career. Send any type of pornography, including those sent to Through Social Networks. Lustful gazing. Repeatedly looking at breasts, genitals or buttocks. Displaying images of sexual content. Eavesdropping. Insistently asking for appointments. Making obscene gestures. Violating personal space. 	<ul style="list-style-type: none"> Temporary disqualification for promotion for a period of up to 3 years. Disciplinary dismissal.
Gross misconduct	<p>Conduct involving coercion, sexual abuse or assault:</p> <ul style="list-style-type: none"> Rubbing or pressing oneself against someone in a suggestive way. Explicit or implicit threat of career harm if sexual relations are not maintained or sexual behavior is not engaged in. Violation. Threat to block or offer to accelerate access to benefits, contacts or projects in exchange for sexual contacts. Quid pro quo. Use of physical superiority (height, build, etc.) to dominate another person in any way. Displaying genitalia. Using formal or informal hierarchical position to solicit dates or sexual relations. 	<ul style="list-style-type: none"> Disciplinary dismissal.

FORM OF THE FAULT	DEFINITION	SANCTIONS
False report	An accusation shall be understood as such if it is presented knowing it to be false and/or manipulating the truth, with the intention of harming the person accused. For an accusation to be considered first of all, it must be demonstrated that the fact denounced is false, first of all, it must be demonstrated that the fact denounced is false. Did not happen and, secondly, that it has been filed in bad faith with the intention of harming the interests of the other person. It must also have been filed against a determined and identified person, i.e., mentioning their name and surnames, and following the channels included in this protocol.	<ul style="list-style-type: none"> • Suspension of employment and salary from 16 to 60 days. • Disciplinary dismissal in the event of repetitive.

In addition to these sanctions, the Equality Group within the HR Excellence process may propose preventive, sensitisation, or awareness-raising actions when deemed appropriate and in accordance with the criteria of the Scientific Directorate and Management.

10. TRAINING

To ensure the effectiveness and continuous improvement of our harassment protocol, it is essential to implement a training process to ensure that all employees are aware of it.

In this regard, two seminars are conducted twice a year, led by an internal BC3 staff member. These seminars will focus on explaining how the active harassment protocol works, how to use it properly, and the channels available for reporting incidents. Attendance is not mandatory but is recommended for all BC3 staff.

Additionally, a harassment training session will be held annually to ensure that all staff, including new recruits, receive this training within one year of joining the company.

At the same time, voluntary training on sexual and sexist harassment will be offered to individuals who have been reported for inappropriate behaviour. This initiative seeks not only to correct behaviours but also to provide the people involved with a better understanding of the implications of their actions and how these affect others and the team as a whole.

11. COMMUNICATION STRATEGIES

To ensure the effectiveness and continuous improvement of our harassment protocol, the following measures will be implemented:

- Infographics: Clear infographics summarising the harassment protocol will be displayed at strategic points, such as the entrance communications panel and on the BC3 intranet. This ensures that all members and visitors have easy access to essential information about the protocol.
- Required reading for all new hires.
- Annual required reading:
 - Reading procedure: It is mandatory for all BC3 staff, as well as guests on internships or research stays, to read the harassment protocol once a year. This measure ensures that everyone is regularly updated on policies and procedures.
 - Reading confirmation: We will implement a reading confirmation system where all individuals must affirm that they have read and understood the protocol. Additionally, they will confirm their awareness of the existence and role of the Focal Point at BC3 and how to contact her, as well as the figure of External Specialised Counselling and the means to access it.

12. MONITORING AND EVALUATION

To ensure the effectiveness and continuous improvement of our harassment protocol, it is essential to implement a monitoring and evaluation section to guide its adequacy.

This section aims to monitor the implementation of the protocol, evaluate its impact and effectiveness, and identify opportunities for improvement. Through a structured system of data collection, analysis, and feedback, we can ensure that our protocol adequately responds to the needs of our workforce and adjusts to emerging changes and challenges. This approach not only promotes a safer and more respectful work environment but also reinforces our commitment and responsibility to eradicate all forms of gender-based violence. Below, we will detail the key components of this monitoring and evaluation section, including objectives, data collection methods, monitoring frequency, responsible parties, reporting, and improvement actions.

The main objective of this exercise is to monitor and evaluate the protocol, ensuring compliance, assessing the effectiveness of actions taken, and continuously improving the protocol.

Indicators:

- Quantitative: Number of cases reported, number of cases completed, average case resolution time, etc.
- Qualitative: Level of satisfaction of the people involved with the process, perceptions of the work environment in terms of safety and respect, etc.

Data collection methods:

- File review: Regularly analyse recorded cases and actions taken to identify patterns or areas for improvement.
- Satisfaction surveys: Conduct anonymous surveys of all parties involved after resolving each case to measure the perception of the effectiveness of the process.
- Reading Confirmation Record: Use of a digital form as part of the reading confirmation system to record and verify annually who has completed reading the protocol.

Frequency of monitoring and reporting

- Continuous monitoring: Implement a real-time monitoring system where performance indicators can be constantly visualized.
- Periodic evaluations: Conduct formal evaluations of the protocol and its implementation on an annual basis.
- Regular reporting: Generate periodic reports summarizing monitoring and evaluation findings, including specific recommendations.

Review

- Protocol update: Review and update the protocol every 2 years based on the results of evaluations and feedback from staff to ensure that it remains relevant and effective.

