



ACTION PLAN AGAINST SEXUAL HARASSMENT

GUIDELINES FOR THE PREVENTION AND HANDLING OF SEXUAL HARASSMENT

GUIDANCE FOR STAFF, STUDENTS AND REPRESENTATIVES

AT NLA UNIVERSITY COLLEGE

Revised in 2019

Approved by the Rector

16.10.2019

1. Background and purpose

NLA University College practises a zero-tolerance policy in relation to sexual harassment. When such matters are reported, the party reporting the situation and the aggrieved party must be treated in a caring and professional manner and in accordance with current guidelines. The main purpose of the action plan is to raise awareness among staff and students with regard to:

- What constitutes sexual harassment
- The efforts to prevent sexual harassment at NLA University College
- NLA University College's procedure for handling reports of and information concerning sexual harassment

All students, employees (pursuant to the [Working Environment Act](#)), visitors and affiliates at NLA University College can report sexual harassment.

This action plan is part of the quality assurance system at NLA University College.

2. What constitutes sexual harassment?

Sexual harassment is unwanted sexual attention where the purpose or intended effect is to be offensive, intimidating, hostile, degrading, humiliating or troublesome. Sexual harassment can be physical, verbal or non-verbal (body language), and can cover everything from sexual comments about a person's body and appearance, simulation of sexual movements, fondling, pawing and touching to sexual abuse. Showing images and videos with sexual content could also constitute sexual harassment. Sexual harassment can occur in the workplace during working hours, but can also happen outside working hours and the workplace, such as at Christmas parties, work trips and through social media. Where there is an asymmetric relationship or an imbalance in the power relations between the parties involved, this may be an aggravating factor ([Report by the working group on bullying and harassment in the higher education sector \(UHRMOT\), 2019](#)).

NLA University College also refers to [sikresiden.no](#) for general advice and guidance.

3. Ethical guidelines on sexual harassment¹

NLA University College has zero tolerance for bullying and harassment.

Infringements of personal and professional integrity: Staff must show respect for the personal and professional integrity of colleagues and students and refrain from any actions or comments that could be perceived as an attack on such.

Dual relations: A clear awareness of one's role and power is required in the relationship between employee and student. Close relationships between an employee and student will affect the learning environment and impact on impartiality and trust. Employees have a special responsibility not to enter into relationships that place students in a vulnerable situation. A clear awareness of one's role and power is also required in relationships between employees.

¹ Based on input to the ethical guidelines in the [Report by the working group on bullying and harassment in the higher education sector \(UHRMOT\), 2019](#)

4. Preventive measures

Preventive measures to combat sexual harassment shall be an integral part of the working and learning environment at NLA University College. This means that sexual harassment must be prevented in the same systematic way as other health, environmental and safety risks. [The Norwegian Labour Inspection Authority and the Equality and Anti-discrimination Ombud \(LDO\)](#) present six key preventive measures. At NLA University College, this entails the following:

- The risks of sexual harassment in the workplace are identified, and measures are implemented based on the results.
- Information is given to staff and students about the rules and procedures that apply.
- NLA University College has drawn up procedures for reporting and handling sexual harassment. All students and staff at NLA University College must be able to access the document. The action plan should also be distributed to managers and buddies in the university's buddy system at the start of studies.
- An assessment will be made of whether breaches of procedures and guidelines should have consequences for the harasser.
- Management has a responsibility to work actively to prevent harassment.
- There shall be transparency surrounding the topic.

The Rector is responsible for these measures being followed up. A core part of the efforts to prevent and identify sexual harassment is the inclusion of the topic in internal courses and work sessions about the working and/or learning environment. As part of such training, individuals can be encouraged to reflect on what they themselves can do to help ensure that their own attitude and behaviour cannot be perceived in a negative light by others.

Procedures for reporting and handling sexual harassment

Anyone who becomes aware of circumstances that entail sexual harassment is encouraged to report this in accordance with these guidelines. If you have been subjected to unwanted behaviour, you have **several choices** depending on the severity and nature of the situation:

1. The matter can be raised with:	
For students:	For staff:
<ul style="list-style-type: none"> • The student ombud • Student representatives • A member of staff you trust <p>Students at the various campuses can also raise the matter with:</p> <ul style="list-style-type: none"> • NLA University College Breistein: student chaplain/supervisor • NLA University College Sandviken: student chaplain/supervisor • NLA University College Oslo: student chaplain • NLA University College Kristiansand: study advisor 	<ul style="list-style-type: none"> • Immediate superior • Director of Human Resources • Employee representative and/or safety officer • A colleague you trust

Visitors, contract workers and affiliates can report such matters to their contact person at NLA University College and/or the Director of Student Affairs and the Director of Human Resources.	
2. Where to go for advice and support:	
<ul style="list-style-type: none"> • Student welfare organisation (Sammen Health, SiO Health or SiA Health) 	<ul style="list-style-type: none"> • Occupational health service
3. Reporting channels:	
The <i>Si fra</i> portal is accessible via NLA's website.	
For students:	For staff:
<ul style="list-style-type: none"> • The <i>Si fra</i> portal 	<ul style="list-style-type: none"> • The <i>Si fra</i> portal • Immediate superior, Director of Human Resources, employee representative and/or safety officer
Reporting parties retain the right to report relevant matters to public authorities, such as the Norwegian Labour Inspection Authority, but it is preferable that attempts are made to resolve such matters via internal systems, as facilitated by NLA University College. It should be noted that making false accusations against someone is an offence.	
4. How can sexual harassment be reported?	
Sexual harassment can be reported orally or in writing: <ul style="list-style-type: none"> • Orally: via telephone or directly to the Director of Human Resources/Director of Student Affairs • In writing: via the <i>Si fra</i> portal or by letter or email <p>Students can report sexual harassment anonymously, but it is preferable that they state their identity so that NLA University College can investigate the matter as thoroughly as possible. When the person receiving the report knows the identity of the reporting party, this also ensures the best possible result. The identity of the reporting party remains confidential and will only be made known to the limited number of persons handling the case.</p>	
5. What details should be reported?	
The report should include: <ul style="list-style-type: none"> • Full name (Students can report matters anonymously.) • Timeframe, or date and time of the incident or observation • Specific details of what was observed or experienced • Where the sexual harassment took place • Other witnesses • Any knowledge of previous instances 	
6. Follow-up of report:	
The Director of Student Affairs will be informed of all matters involving students .	The Director of Human Resources will be informed of all matters involving staff .
<ul style="list-style-type: none"> • The person receiving a report of sexual harassment must register the case and, where relevant, gather the information that is necessary for further processing. • The Director of Human Resources/Director of Student Affairs shall be given access to the report. They will consider who else should be given access and who else should be involved in the case. 	

<ul style="list-style-type: none"> • Immediate consideration shall be given to whether specific measures should be taken to re-establish a safe and secure working environment and prevent recurrences. Furthermore, it must be ensured that the reporting party has a safe and secure working environment. If necessary, measures must be taken to prevent retaliation against the reporting party. • NLA University College decides who will handle the case. Normally, the case officer will be an immediate superior, the Director of Human Resources or the Director of Student Affairs. • The case officer shall ensure that the matter is thoroughly investigated within a reasonable timeframe. Investigations will often be based on conversations with parties involved and entail obtaining documentation. Information that emerges in discussions and correspondence with the case officer may be passed on. However, the case officer must not involve more people than necessary. • If NLA University College knows who reported the matter, this person should receive feedback as soon as possible on how the case is being handled. As far as possible, they should also be given feedback on the outcome of the case. If investigations find that no harassment has taken place, the reporting party shall also receive feedback on this. • Reports of harassment by named persons are to be regarded as personal data and must be treated in accordance with the rules of the Personal Data Act. • Consideration must be given to whether the case is of such a severity that it should be reported to the police. 	
<ul style="list-style-type: none"> • Students' complaints about the learning environment are dealt with in accordance with the Act relating to universities and university colleges, section 4-3. 	<p>In the follow-up of reports from staff, reference is also made to the following documents at NLA University College:</p> <ul style="list-style-type: none"> • Guidelines for handling conflicts • Procedure for internal reporting of censurable conditions
<ul style="list-style-type: none"> • If the information relates to a matter that may involve managers at NLA University College, and/or the reporting party has not elicited any response from the person they approached first, the Chairman of the Board at NLA University College can be contacted. 	
<p>Guarding against future occurrences:</p>	
<ul style="list-style-type: none"> • If a student experiences retaliation after reporting sexual harassment, he or she can report this using the same procedure. 	<ul style="list-style-type: none"> • As a member of staff, you are also protected from any future reports of harassment. This means that if, in your capacity as an employee, you use lawful working methods to gather information or provide material for use in any future reports of harassment, you are protected under the Working Environment Act's safeguard against reprisals.