



GUIDELINES

**FOR PREVENTING AND ADDRESSING
DISCRIMINATION, HARASSMENT,
SEXUAL HARASSMENT AND BULLYING**

The Stockholm School of Economics (SSE) strives to be a creative and stimulating place for working and studying where people with different backgrounds and experiences are given the same rights and opportunities. In addition, SSE has a zero-tolerance attitude regarding discrimination, harassment, sexual harassment and bullying, and actively works to prevent them from occurring.

WHAT THE REGULATIONS SAY

The Swedish Discrimination Act (2008:567) prohibits discrimination, harassment and sexual harassment. The law applies to both the workplace and schools, and employees and students are protected on the basis of age, disability, ethnicity or origin, gender, gender identity or expression, religion or other beliefs, and sexual orientation.

Discrimination is treating someone differently than you would have treated someone else in a similar situation. This could, for example, be not hiring someone or not giving them a passing grade solely because of their religion or sexual orientation. It could also be not providing adequate accessibility to someone with a disability.

Harassment is offending the integrity and dignity of an individual or a group of people. This includes disrespectful or patronizing treatment, such as slander, exclusion, insinuation, persecution or exaggerated control of a student or an employee.

Sexual harassment is unwelcome behavior of a sexual nature, such as touching, jokes, suggestions, jargon or pictures.

Note that the Discrimination Act also requires employers and education providers to make it easier for employees/students to combine work/studies with parenthood. In addition, the Parental Leave Act (1995:584) prohibits disadvantaging someone who is, will be or has been on parental leave. This includes temporary parental leave for the care of a sick child.

The Organisational and Social Work Environment Provisions (AFS 2015:4) prohibit *bullying*, which is actions that are experienced as violating or in another way undesirable by the person or persons who are subjected to them. These actions may lead to ill health or exclusion from the workplace community. For example, this may be calling someone a derogatory name or making fun of them, systematically ignoring them, or withholding information to which they are entitled.

According to the regulations, the person who feels that they have been subjected has the right to define what is offensive or unwelcome behavior. SSE is legally obligated to investigate when discrimination, harassment, sexual harassment or bullying is brought to our attention, and to take appropriate measures if the inves-



tigation determines that an offense has been committed. Perpetrators are subject to reprimand, suspension and dismissal/expulsion in accordance with the Discrimination Act, Swedish labor laws and the SSE Disciplinary Regulations.

PREVENTATIVE MEASURES FOR EVERYONE TO TAKE

Discrimination, harassment, sexual harassment and bullying can occur for many different reasons. They may be used as a way to gain power within a group. They may be the result of problems in the working environment. Or they may simply indicate an unprofessional and disrespectful attitude. No matter why they occur, they have no place at SSE.

We are all—employees and students alike—responsible for creating a positive,

open and inclusive environment. When individuals take this responsibility seriously, they carry out one of the most important preventative measures to minimize the risk of discrimination, harassment, sexual harassment and bullying from occurring.

Take the following actions:

- Set a good example and clearly show that you do not tolerate discrimination, harassment, sexual harassment or bullying of any kind.
- Mind your choice of words and your behavior; be aware of how they may be interpreted by others.
- Don't be a bystander. Rather, stop and challenge any unacceptable behavior you encounter.
- Support anyone who feels that they have been subjected.



IF YOU ARE SUBJECTED TO DISCRIMINATION, HARASSMENT, SEXUAL HARASSMENT OR BULLYING

You do not have to put up with being discriminated against, harassed, sexually harassed or bullied—they are prohibited! However, according to the regulations the perpetrator must be made aware that their behavior is unacceptable and unwelcome and that it must end. This can be done verbally, in writing or by someone you trust.

Take the following actions:

- Be abundantly clear. Leave no room for misunderstanding.
- Write down what happened. Record the date, time, any witnesses, what was said and done, how you felt, what you were thinking and how you reacted.
- Talk to your manager or teacher. If it is your manager/teacher who is subjecting you, talk to their manager/department head.

- Talk to your union representative, safety officer, the SSE Diversity, Equity and Inclusion Manager, the SASSE Equality Representative, or someone else that you trust.

Note that reprisals are strictly prohibited, which means that you are not allowed to be subjected to any form of punishment or negative treatment because you made a complaint. SSE will take all necessary actions to ensure that reprisals do not take place.

FOR MANAGERS AND DEPARTMENT HEADS

As a manager or department head, you should as quickly and discreetly as possible find out what has happened, for example by interviewing those involved and any witnesses. If you determine that discrimination, harassment, sexual harassment or bullying has occurred, then you are obligated to take appropriate measures to put a stop to them.

Take the following actions:

- Start with an open mind and listen to what the victim has to say. Take notes on what has happened. Emphasize that everything said is confidential and that it is the victim who decides what should be passed on to others. Show empathy and treat the person with respect.
- Provide information on what the regulations say and go through the options for further investigation. Take no action without the victim's consent.
- Determine whether you need assistance from your manager, the HR department,



- the Diversity, Equity and Inclusion Manager, the Office of the General Counsel or the company health care provider.
- Carry out your investigation. Interview the alleged perpetrator and any witnesses. Gather any evidence (e-mails, text messages, screenshots, etc.). Make an objective decision based on your investigation.
- If your investigation determines that an offense has occurred, then tell the harasser that their behavior is unacceptable and must cease immediately. In many cases, this is sufficient to stop the behavior.



- Keep in contact with the victim even if they are on sick leave. It is important to show your willingness to solve the problem and to show that they are needed at their workplace/school. If necessary, make sure that the victim receives support from the company health care provider or other relevant source. Offer to help the victim file a police report if they so choose, such as in cases of physical or sexual violence.
- Document the findings of your investigation. The documentation must be stored so that it cannot be accessed by unauthorized persons and deleted after two years or when the employee/student leaves SSE (whichever comes first). Note that anonymized documentation for statistical purposes need not be deleted, and that as a private institution SSE is not bound by the

Swedish principle of public access to information.

- Document what measures will be taken and follow up that they have been taken.

FOR ALL EMPLOYEES

Sometimes the betrayal of one's colleagues or teachers feels worse than the actual violation. As a fellow human being, everyone has a moral responsibility to act if offenses occur. It is better that problems are raised and can be corrected instead of pretending that they do not exist.

Take the following actions:

- Clearly show that you do not tolerate discrimination, harassment, sexual harassment and bullying at your workplace or in your classroom.



- Listen supportively if a colleague or student comes to you and says that they have been subjected. Remind them that as both an employer and as a school, SSE is legally obligated to investigate when discrimination, harassment, sexual harassment or bullying is brought to our attention, and to take appropriate measures if the investigation determines that an offense has been committed.
- Show your support by offering to come along when your colleague or student raises their issue with the appropriate person.

FOR TRADE UNION REPRESENTATIVES

Trade unions play a key role in promoting equal rights and opportunities and combating discrimination, harassment, sexual harassment and bullying. If the victim is a member of a trade union, then the trade union has the legal right to represent the member in labor disputes. It is therefore important that trade union representatives are supportive of their members.

Take the following actions:

- Listen to the member and encourage them to document what has happened.
- Suggest that the member discuss the problem with their manager. Offer to come along if the member wants you to.

If the manager is part of the problem, then you and the member can contact the manager's manager.

- Be objective. Do not take sides but rather listen to everyone who is involved.

ROMANTIC AND SEXUAL RELATIONSHIPS

Mutual flirtation, romance or consenting sexual relations between, for example, a teacher and a student or a manager and an employee are not legally considered to be sexual harassment. However, on such occasions there is an unequal balance of power and a conflict of interests. It is therefore of utmost importance that this imbalance—and thereby the appropriateness of the relationship—be taken into consideration. In the event of romantic or sexual relationships, the teacher/manager (that is, the person in the position of power) will no longer be allowed to participate in decisions regarding their partner due to the conflict of interest.

DO YOU WANT TO KNOW MORE?

For further information about preventing and addressing discrimination, harassment, sexual harassment and bullying at SSE, please contact the Diversity, Equity and Inclusion Manager, the Human Resources Department or the Office of the General Counsel. Note that they are all bound by professional secrecy. You can also find more information on the SSE intranet (<https://portal.hhs.se>), the website of the Swedish Equality Ombudsman (<https://www.do.se>) and the website of the Swedish Work Environment Authority (<https://www.av.se>).



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