

Preventing and Managing Harassment and Conflict in Public Administrations across Members of the European Public Administration Network (EUPAN)

Exploratory Study – 2025



About this Study

This exploratory study provides an overview of approaches to **preventing and managing harassment and conflict in public administrations**. It summarizes the responses of **19 countries and the European Commission** to a survey conducted on this topic.

The survey was initiated by the Grand Duchy of Luxembourg, Ministry of the Civil Service, and circulated via the **European Public Administration Network (EUPAN)** in **September 2025**. This study is part of the Ministry's **internal project** aimed at **strengthening internal structures** for the **prevention and management of reported harassment and conflict situations** in Luxembourg's public administration.

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I. Prevention Activities



What types of activities are implemented in your public administration to prevent harassment and conflict and to raise awareness among staff?

Question 1

Prevention and Awareness Activities - Global Overview

a) Codes of conduct and ethical frameworks

Many public administrations rely on **ethical frameworks** to define **expected standards of conduct** and promote respectful workplace relations. These typically take the form of **codes of conduct** or **ethics codes** setting behavioural expectations and values.

Examples by country :

- **Croatia:** Provisions in the Collective Agreement defining standards of conduct and protecting the dignity of civil servants.
- **Estonia:** Code of Ethics for Officials setting standards of conduct and respectful behaviour.
- **Portugal:** Mandatory codes of conduct of public employers defining behavioural standards, complemented by national guidance and model tools for drafting codes of good conduct.
- **Romania:** Adoption of codes of conduct, supported by ethics advisers to promote integrity and compliance.

Prevention and Awareness Activities - Global Overview

b) Training and capacity building

Training is a common element of prevention efforts. Activities range from **national programmes to organisation-level courses**, including **face-to-face training and e-learning**. Training often **targets managers** among other groups and is often embedded in **broader frameworks on ethics, equality, diversity or well-being at work**.

Examples by country:

- **Belgium:** Training programmes for managers including modules on well-being at work.
- **Croatia:** On-site workshops and permanent e-learning on harassment and conflict prevention.
- **Latvia:** Learning courses are provided on internal communication, psychological microclimate in teams, workplace well-being, mobbing and bossing and ethics and integrity.
- **Portugal:** Training courses on harassment prevention provided through national training platforms.
- **Romania:** Training programmes for civil servants under national priority areas covering human resources, diversity, inclusion and leadership, including the prevention of psychological harassment in the workplace.

Prevention and Awareness Activities - Global Overview

c) Awareness raising and communication

Beyond formal training, several administrations use communication and awareness-raising activities to **promote zero tolerance for harassment and make prevention measures visible**. These initiatives aim to inform staff about unacceptable behaviour, available support and reporting options and to lay the foundation for a culture of respect and inclusion.

Examples by country:

- **European Commission:** Internal communication initiatives, visual materials and explanatory fiches linked to the anti-harassment policy.
- **France:** Information and awareness activities for managers on conflict management (e.g. *“La Boussole du manager”*).
- **Portugal:** National campaigns such as “Equality Minutes” and “Zero Tolerance for Harassment at Work”.
- **Spain:** Awareness campaigns conducted under the Action Protocol against sexual and gender-based harassment.

Prevention and Awareness Activities - Global Overview

d) Monitoring and risk assessment

Several administrations complement preventive measures with monitoring tools to **assess workplace climate and identify risks**. These include **psychosocial risk assessments, staff surveys, integrity-related monitoring and reporting obligations**. Such mechanisms support early detection of problems and inform preventive action.

Examples by country:

- **Belgium:** Periodic psychosocial risk analysis required for federal departments.
- **Poland:** Questionnaire for self-assessment of the integrity culture and related compliance activities.
- **Portugal:** Monitoring and auditing activities in the field of harassment conducted by the Inspectorate General of Finance (IGF).
- **Switzerland:** Regular staff surveys including sections on sexual harassment and mobbing.

Prevention and Awareness Activities - Global Overview

e) Practical tools and support instruments

Some administrations provide practical tools to **support prevention and facilitate early dialogue on harassment and conflict**. These tools are designed to be accessible and user-friendly and often complement training and awareness measures.

Examples by country:

- **Latvia:** An ethics game is used as a practical tool to help staff reflect on appropriate behaviour and how to act in concrete situations.
- **Portugal:** Interactive online questionnaires on harassment prevention; model tools for drafting codes of good conduct.
- **Poland:** Online resources and FAQs; self-assessment questionnaire; good practice materials to download (calendars, posters, screensavers, leaflets, etc.).

Prevention and Awareness Activities - Global Overview

f) Organisational culture and leadership responsibility

Several administrations highlight **organisational culture and leadership roles as important enablers of prevention**. Efforts focus on promoting respect, inclusion and integrity through leadership behaviour, managerial accountability and consistent communication of values.

Examples by country:

- **European Commission:** Emphasis on a respectful working environment, supported by a guide for a respectful working environment, mandatory management training and active involvement of managers in prevention and early conflict management.
- **Latvia:** Topics related to respectful and inclusive workplaces are incorporated into the Senior Leadership Development Programme and targeted awareness-raising is addressed to senior leaders and HR.
- **Portugal:** Promotion of a zero-tolerance organisational culture, supported by ethical leadership training and clear managerial responsibility for disciplinary action.
- **Slovenia:** Supervisors are responsible for informing staff about dignity protection measures, receiving notifications, and taking appropriate follow-up measures within defined time limits.

If structured training sessions are part of these efforts, what topics are covered and who are the main target groups? Are any of these trainings mandatory?

Question 2

Structured Training for Harassment and Conflict Prevention

Training topics

Training initiatives cover a wide range of topics, with **equal treatment, diversity and inclusion** emerging as the most common focus areas, followed by **harassment prevention and conflict management**. Many programmes also address **communication and leadership skills**, while **health and well-being** are less frequently addressed as stand-alone training programmes and are often combined with other topics. **Ethics or integrity topics** are frequently addressed as part of broader training programmes and complement wider awareness and prevention efforts.

Target groups

Target groups range from all public employees to specific categories such as managers, HR staff, ethics advisers, or equality officers. **Leadership trainings** often emphasise **conflict resolution, respectful communication, and psychological safety** (e.g. Germany, Portugal, Austria), while general staff courses focus on **awareness and prevention** (e.g. Spain, Greece, Serbia, Slovenia).

In several administrations, participation is **mandatory for managers or new employees** (e.g. Austria, European Commission), whereas in others, courses are offered as part of voluntary development or awareness initiatives (e.g. Italy, Latvia).

Delivery formats

Training delivery formats vary across administrations. Based on the information provided, **e-learning formats** are mainly mentioned in relation to **awareness-raising and introductory training**, particularly on well-being, occupational safety, ethics or harassment (e.g. Belgium, Estonia, Switzerland). More **interactive formats**, such as courses or **workshops**, are more commonly mentioned in connection with **conflict management and leadership development** (e.g. Austria, Germany, European Commission).

Overview of Training Topics

a) Equal Treatment, Diversity & Inclusion

- **Albania:** Ethics, violence and sexism, workplace discrimination.
- **Austria:** Equal treatment, respect and appreciation.
- **France:** Secularism/neutrality, racism, LGBT+, disability, diversity and discrimination.
- **Italy:** The Culture of Respect – inclusion, human rights, discrimination.
- **Portugal:** Equality and non-discrimination, human rights and accessibility, intercultural competence, literacy on racism and racial discrimination, gender equality in work and employment.

b) Harassment, Bullying & Violence Prevention

- **Czech Republic:** Definition and manifestations of sexual harassment, reporting and response mechanisms.
- **European Commission:** Anti-harassment policy for managers; “Let’s talk about harassment” for employees.
- **Germany:** Recognizing and managing boundary violations (bullying, sexual harassment).
- **Portugal:** Bullying and cyberbullying: prevent & act.
- **Switzerland:** Sexual harassment – employer’s duty of care, employee rights, what to do if you are a witness.

Overview of Training Topics

c) Conflict Management & Mediation

- **Austria:** De-escalating conflicts, mediation for managers, conflict solving for managers and all staff.
- **European Commission:** Conflict prevention and resolution, distinction between potential situations of harassment and conflict at work.
- **Germany:** Conflict management as a leadership task, constructive conflict management.
- **Portugal:** Ethical leadership and conflict resolution, conflict management, assertiveness and negotiation.

d) Communication, Teamwork & Leadership

- **Croatia:** Effective communication, interpersonal relationships.
- **European Commission:** Active listening and non-violent communication.
- **Germany:** Communicating and cooperating, leadership and teamwork, constructive communication.
- **Portugal:** Assertiveness, negotiation, ethical leadership, organisational culture of integrity.
- **Sweden:** Conversation techniques, values of good administration.
- **Spain:** Teamwork.

Overview of Training Topics

e) Health, Well-being & Occupational Safety

- **Belgium:** Well-being at work, including psychosocial aspects (online questionnaire and e-learning).
- **Croatia:** Mindfulness, stress and crisis management, employee well-being.
- **Estonia:** Occupational health and safety e-learning (risk prevention, ergonomics, mental health).
- **Germany:** Leading healthily and appreciatively.
- **Greece:** Stress management, workplace ethics.
- **Portugal:** Psychosocial risk management, introduction to occupational safety and health.
- **Serbia:** Psychological safety in the workplace.

f) Ethics, Integrity & Legal Awareness

- **Austria:** Code of conduct and compliance training.
- **Albania:** Ethics training (mandatory as part of “Introduction to Public Administration”).
- **Germany:** Basic legal knowledge and practical case scenarios (civil servant law, disciplinary law, labour law, equality law).
- **Latvia:** Ethics and integrity courses, including an ethics game designed to understand how to act in specific situations.
- **Portugal:** Codes of conduct, organisational culture of integrity, management of whistleblowing channels.
- **Romania:** Professional development topics regulated at national level for civil servants.

Is the prevention of harassment and conflict part of a broader strategy, for example to improve staff well-being and working conditions? If yes, could you briefly describe this strategy?

Question 3

Harassment and Conflict Prevention within broader Strategies

Across the countries reviewed, there is increasing integration of harassment and conflict prevention as well as well-being into **broader strategies for workplace safety, equality, and organizational culture**. Many countries (e.g. Portugal, Greece, Estonia) embed these matters within **occupational health and safety frameworks**, often with **legal obligations** for employers to **protect both physical and psychological health**.

Gender equality is a recurring theme, especially in countries like Croatia, Spain and Romania where national strategies explicitly link **workplace well-being** to **broader equality and anti-discrimination goals**. Italy and the European Commission focus on structured training and competence frameworks that include **ethics, inclusion, and violence/harassment prevention**.

Some countries, like Austria and Poland, show **decentralized approaches**, with strategies or actions developed at the level of individual ministries or offices. In contrast, Belgium and Portugal demonstrate **coordinated systems** involving multiple institutional actors and services.

Where strategies exist, common elements include:

- Integration of harassment prevention into broader **well-being and occupational safety policies**
- Emphasis on **psychological safety** and **healthy work environments**
- Links to **gender equality, inclusion, and ethical standards**
- Use of **codes of conduct** and **structured training** to shape **organizational culture**
- Mechanisms for **reporting, monitoring, and trust-building**

Harassment and Conflict Prevention within broader Strategies

Examples by country :

- **Albania:** Prevention of harassment and conflict is part of a broader strategy to **improve staff well-being and working conditions**. The National Strategy for Employment and Skills 2023–2030 **addresses workplace discrimination, promotes occupational safety and mental health**, and supports **ethical training and fair employer–employee relations**. It aligns with EU and ILO standards.
- **Austria:** Several ministries have their own strategies and frameworks on harassment and conflict.
- **Belgium:** Strategy for **welfare at work** is incorporated into the **organisation's dynamic risk management system**. Bodies that work on improvement of welfare and working conditions are: joint prevention service, central training service and local prevention, training and welfare services.
- **Croatia: National Plan for Gender Equality** until 2027 aims to **remove all forms of discrimination based on gender and establish real gender equality**. Contains a vision of development, needs, potentials and priorities. These are to be considered within various public policies to achieve a democratic society with equal opportunities for all citizens.
- **Czech Republic:** Prevention strategy as part of broader efforts to improve working environment and psychological safety. **Investing in relationships** fosters openness and lowers harassment risk. **Monitoring** should cover overall **work climate, including mobbing and bossing**. Toxic environments lead to turnover and low productivity. Promoting a “speak up” culture helps build trust and safety.
- **Estonia: Occupational Health and Safety Act** – employer must take **measures to prevent health damage from psychosocial hazards**. Includes adapting work and workplace, optimizing workload, allowing breaks, and improving psychosocial environment. Hazards include violence, unequal treatment, bullying, unsuitable tasks, working alone, monotonous work, and stress-related factors.

Harassment and Conflict Prevention within broader Strategies

- **European Commission:** The Commission HR Strategy (Communication C(2022) 2229 final) is set to **promote staff well-being and work-life balance** and to this end includes actions pertaining to **management development, staff wellbeing** and the promotion of **diversity, inclusion, and gender equality**.
- **France:** The prevention of harassment and conflict is framed by the *Plan santé au travail (2022–2025)*, which promotes initiatives in prevention (including psychosocial risks and harassment), reaffirms the legal obligation to maintain the DUERP (risk assessment document) and encourages work-organisation measures (e.g. impact studies) to improve working conditions in the public service.
- **Greece:** Greek legislation sets out comprehensive obligations for employers to **promote well-being and protect workers from psychosocial risks, violence and harassment**. Employers must **inform staff about health and safety rules**, including measures against workplace violence. They are required to **assess and adapt safety measures, improve working conditions and support training. Occupational doctors advise on workplace design, mental and physical health, and reintegration of affected individuals** and monitor the implementation of protective measures.
- **Italy:** National strategies provide **structured training** to strengthen public sector employees' skills. Among others, the Training Directive (Jan 14, 2025) promotes programs aimed at **reducing inequalities and promoting equity in service delivery**. It also establishes a competence framework including **ethics, social inclusion, gender equality, and fight against violence**.
- **Latvia:** There is no specific national strategy; prevention of harassment and conflict is considered part of labour protection, particularly regarding psychological and physical working environment factors.
- **Poland:** At the level of specific offices, such activities may take place. There is no central strategy.

Harassment and Conflict Prevention within broader Strategies

- **Romania:** The National Strategy promotes **equal opportunities and treatment between women and men** and aims to **prevent and combat domestic violence and violence against women**. It is structured around two main pillars: one focused on **gender equality** in all areas of life and the other on **protecting individuals from domestic and gender-based violence**.
- **Portugal:** Prevention of harassment and conflict is treated as part of a broader strategy to **promote employee well-being, healthy workplaces and better working conditions**. Employers are legally required to protect physical and psychological health under occupational health and safety rules. **Mandatory codes of conduct** against harassment often include **broader commitments to dignity, equality and inclusion**. Public administration initiatives link harassment prevention to **stress management, work-life balance and professional development**, with national guidance provided by bodies such as the Commission for Equality in Work and Employment (CITE).
- **Spain:** **Gender equality** at the workplace, according to the general legal framework and the plans for equality at the general administration of the State.
- **Switzerland:** Part of a broader **personnel strategy** that aims to ensure a **respectful and discrimination-free working environment**.

Do you use tools to monitor the workplace climate or identify psychosocial risks? If yes, which tools do you use, at what frequency and how are the results followed up?

Question 4

Monitoring Tools for Workplace Climate and Psychosocial Risks

Countries use a variety of tools to monitor workplace climate and identify psychosocial risks, reflecting different institutional and legal traditions.

In several cases, monitoring relies mainly on **internal staff surveys conducted at organisational level**, often anonymous and focused on job satisfaction, stress, harassment or organisational climate (e.g. Slovenia, Switzerland, Czech Republic). These tools are often recommended rather than strictly mandatory in some cases and results are followed up through training, awareness-raising activities, or adjustments to work organisation and management practices.

In other cases, monitoring is embedded in **clear legal or centrally defined frameworks**, for example through occupational health and safety legislation, integrity systems or formal evaluation schemes (e.g. Austria, Belgium, Estonia, Portugal, Romania, Greece). In these frameworks, staff surveys and risk assessments are typically combined **with action plans, reporting obligations and structured follow-up**, sometimes supported by specialised bodies.

Monitoring frequency varies, ranging from biennial surveys (e.g. European Commission, Serbia, Czech Republic) to cycles of four to five years (e.g. Belgium, Germany), while some systems include annual or ongoing monitoring elements (e.g. Poland, Romania, Greece).

The most **commonly used tools** include questionnaires, psychosocial risk assessments, interviews, focus groups and short team pulse or engagement surveys. Several countries rely on standardised instruments, such as COPSOQ (Belgium) or nationally validated diagnostic tools.

Across countries, monitoring activities are generally **followed up through action plans, prevention or ethics structures and managerial reporting**, linking survey results to concrete improvements in working conditions, leadership and psychosocial well-being.

Monitoring Tools for Workplace Climate and Psychosocial Risks

Examples by country:

- **Austria:** The employer must specifically **identify and assess the risks to the safety and health** of employees, including mental stress, using standardised and appropriate survey instruments, questionnaires, moderated groups or individual interviews.
- **Belgium:** The joint prevention service offers a **psychosocial risk analysis using the COPSQ questionnaire**, with the frequency set by ministerial circular at a maximum of every five years and followed up through an action plan.
- **Greece:** As part of the statutory framework for evaluating supervisors, all immediate subordinates are required to complete a **team pulse survey** addressing team functioning, cooperation and issues related to daily work.
- **Latvia:** The main monitoring tool is an **employee engagement survey** conducted across the public administration approximately every 18 months by State Chancellery; institutions may also organise internal surveys.
- **Poland:** **Central monitoring** by the Head of Civil Service (annual ethics/compliance checks and 5-year integrity survey), complemented by **decentralised follow-up and self-assessments** at office level.
- **Portugal:** Public employers are required to **assess psychosocial risks** under occupational health and safety rules using **questionnaires, interviews and focus groups**, complemented by **monitoring through inspectorates and occupational health services**.
- **Romania:** Monitoring is carried out annually through **integrity and corruption risk assessments, ethics advisers' questionnaires and reports and mandatory action plans** addressing harassment and equal treatment.
- **Sweden:** In agencies where threats and violence are common, **risk analyses** are carried out and usually include questions on harassment, threats and violence.

Are all these prevention activities centrally coordinated or managed individually by each organisation (e.g. ministry, agency)?

Question 5

Central or Decentralised Coordination of Prevention Activities

Across the countries reviewed, **prevention activities** such as training, surveys and awareness raising are **organised through different combinations of central level involvement and organisational responsibility**. In most cases, **central actors** play a role in **setting frameworks, providing training offers, or supporting coordination**, while **individual ministries, agencies, or institutions** remain responsible for **implementation and adaptation**. The specific balance between central coordination and organisational autonomy varies across countries and activities.

Examples by country:

- **Germany:** Central training offers are provided by BAKöV, the central training institution of the federal government, while participation is at the discretion of the individual departments.
- **Albania:** Training activities are conducted centrally by ASPA, while other prevention activities are implemented by the responsible institutions.
- **Belgium:** Part of the prevention offering, including training and psychosocial support, is provided centrally, while individual organisations assemble tailored measures adapted to local needs if needed.
- **Estonia:** Prevention activities are managed independently by individual institutions within a general legal and ethical framework.
- **Switzerland:** Online training on sexual harassment is provided centrally, while other prevention measures are the responsibility of departments or units.

II. Procedures and Support Structures



Is there an internal procedure in place to report harassment or conflict within each public organisation?

If yes, is this procedure developed by each organisation or based on a standard framework provided at central level?

How is the procedure formalized? Who are the key actors involved in the procedure?

What role does the supervisory entity play in supporting the management of conflict and harassment?

Based on your experience, how effective is this procedure in practice?

Question 6

Internal Reporting Procedures

Governance of internal procedures

Survey responses indicate that internal procedures to address harassment and workplace conflict exist in many participating public administrations, although levels of standardisation and implementation differ. In some countries, **standardized national frameworks** apply across the public sector and are implemented by individual organisations, sometimes with **designated authorities and reporting obligations defined at central level** (e.g. Belgium, Spain, Greece). In others, **public employers develop their own internal procedures**, resulting in **organisation specific arrangements** (e.g. Austria, Poland, Portugal). Procedures are usually formalised in **written rules** and made accessible through **intranets, codes of conduct or guides**.

Procedural pathways

Across countries, procedures typically provide for **both informal and formal options** rather than a single uniform process. **Informal options** such as **confidential counselling, advisory support, dialogue or mediation** are frequently available, often on a voluntary basis. Where concerns cannot be addressed through these means, or where this is considered inappropriate, procedures provide for **formal reporting**, which **may trigger an investigation** conducted by designated actors or bodies. In some administrations, investigation processes are structured through **clearly defined steps and time limits**, while others foresee specific organisational arrangements such as **dedicated investigation or crisis teams**.

Reporting channels, support structures and oversight

Reporting arrangements generally rely on **designated internal actors** who receive concerns, provide confidential support and initiate further steps. Formal reporting may trigger **investigative and disciplinary processes** and in several frameworks managers or designated officers are required to act upon complaints or forward them to competent bodies. Electronic reporting tools are available in some systems. **External bodies** such as ombuds institutions, audit authorities or equality bodies complement internal procedures, particularly in cases of conflicts of interest, inaction or serious violations. In a number of countries, **reporting obligations, audits or consolidated data collection** are used to support follow up, compliance monitoring and preventive action.

Internal Reporting Procedures

Available country inputs suggest that the following elements are relevant for the **effectiveness of internal procedures**:

- **Availability of informal options, such as confidential counselling, dialogue or mediation**, which are often described as effective for early resolution (e.g. Belgium: “Informal procedures (confidential discussions, intervention by a third party or mediation) are more likely to succeed than formal procedures.”).
- **Trust in designated actors**, which influences whether procedures are used in practice. **Accessible and confidential entry points**, allowing individuals to seek advice or support **without automatically triggering formal procedures** (e.g. Czech Republic: “Employees often do not know who to turn to and fear negative consequences, which means that most cases remain unreported.”).
- **Clear separation between support and investigative functions**, supporting confidentiality and procedural fairness.
- **Predictable procedures with defined steps, responsibilities and time limits**, providing clarity for all parties involved (e.g. Slovenia: “The superior shall take appropriate measures within 15 days.”).
- **Credible follow-up mechanisms**, including obligations for designated actors or managers to act on complaints (e.g. Croatia: “The confidential advisor is obliged (...) to take all necessary measures appropriate to the individual case.”).
- **External oversight and reporting mechanisms**, reinforcing accountability and follow-up (e.g. Portugal: “IGF conducts audits, issues reports and makes recommendations.”).

Internal Procedures for Reporting Harassment or Conflict

- **Albania:** A **standard guide** exists for preventing and addressing violence, harassment and sexual harassment in state administration workplaces, designed for implementation across all public institutions.
- **Austria:** Ministries treat this issue **autonomously** in accordance with the **public employment law regulations**.
- **Belgium:** Internal procedures follow a **legal framework** adapted by organisations to their context. The employer is the main responsible actor, supported by confidential counselors and prevention advisors (psychosocial aspects), while the supervisory entity checks **compliance** and can impose measures. **Informal solutions** (mediation, discussions) are usually more effective than **formal procedures**, which involve a psychosocial investigation and an official report to the employer.
- **Croatia:** **Standard centralized framework** with a confidential advisor as the key actor; complaints may also be raised via a superior civil servant or a union representative, who are required to inform the confidential advisor. Confidential advisor has 8 days to investigate complaint and take action. Confidential advisor has to report to a **Joint Commission** once a year and the Commission needs to submit a consolidated report and propose measures to prevent future unwanted behaviors.
- **Czech Republic:** Each authority sets its **own written procedure** for handling complaints, based on legislation and best-practice guidelines; there is **no central unified framework**. Procedures should be formalized, easily accessible, and employees have the right to file complaints. Key actors include a trained designated person (often HR), immediate superiors, an investigation committee, office management (with ultimate responsibility), and trade unions. External bodies such as ministries, the Ombudsman, and the Labour Inspectorate have limited roles.

Internal Procedures for Reporting Harassment or Conflict

- **Estonia: Internal reporting procedures** exist in public sector organisations, but their form and implementation vary according to each institution's internal regulations and management system.
- **France:** Internal reporting mechanisms are implemented locally; designated referents can act as entry points to initiate mediation and direct agents to the appropriate mechanism.
- **European Commission:** Two procedures for harassment: an **informal** one (since 2023) via CCC, offering support, guidance, and possible referral to a confidential counsellor or services, and a **formal** one, uniform across the Commission, managed by DG HR and the Investigation and Disciplinary Office. For workplace conflicts, the Mediation Service works informally and confidentially; if a formal procedure starts, mediation closes.
- **Greece:** There is a **centralized internal procedure** for reporting workplace violence and harassment in the public sector, defined by ministerial decisions and circulars. Complaints can be submitted internally to an **Integrity Advisor** (or, if unavailable, the highest administrative manager), to supervisory bodies, or externally to the **Ombudsman** (for discrimination cases) and the **National Transparency Authority** if no action is taken within three months. The National Transparency Authority also investigates delays and complaints with conflicts of interest are forwarded to the Ombudsman.
- **Italy:** Internal reporting is possible to the **Equal Opportunities Committee** (CUG), Ethics or Integrity Officer, or a designated advisor; managers must intervene and may start disciplinary proceedings, with trade unions providing support. Externally, victims can turn to the Equality Counselor, police, health services, or anti-violence centers; civil or criminal action is also possible.

Internal Procedures for Reporting Harassment or Conflict

- **Latvia:** There is no standardised procedure; **reporting arrangements are developed by each institution** and are usually regulated in internal documents or codes of ethics, involving actors such as HR, labour protection specialists, managers or trusted ethics persons.
- **Poland:** Each organisation develops its **own written anti-mobbing procedure**, which is mandatory in the civil service; there is no uniform rule. Key actors usually include plenipotentiary for equal treatment, a human resources representative and a team of legal advisers. In principle, the application of the procedure allows the conflict to be resolved.
- **Portugal:** Each organisation may define a **procedure in its code of conduct**, based on legislation and ensuring whistle-blower protection, supported by central guidance and tools. IGF provides an **online form for reporting** harassment. Key actors include IGF, CIG, CITE, HR and occupational health departments, legal departments, and managers. IGF also provides prevention guidance, conducts audits, issues reports and makes recommendations.
- **Romania:** Employers are legally required to establish an **internal procedure** detailing steps for promptly notifying competent authorities to ensure compliance with equal opportunity and treatment laws.
- **Serbia:** Employers **must inform employees in writing** about the prohibition of abuse and their rights, raise awareness, provide support to victims, and take disciplinary measures; failure leads to fines. A designated person offers support, advice and handles whistleblowing and data protection.

Internal Procedures for Reporting Harassment or Conflict

- **Slovenia:** The **procedure is set by a Decree** for all state administration authorities. Informal resolution includes asking the accused to stop and contacting a trained counselor for assistance. If informal resolution fails, the victim must notify the superior in writing, who must act within 15 days and keep the victim informed. A **three-member committee** may be appointed; if suspicion is confirmed or behaviour continues, disciplinary action or dismissal follows. Criminal cases must be reported to police or prosecutor immediately.
- **Spain: Action protocol against sexual and gender-based harassment** in the General Administration of the State and its public bodies. **Standardized framework** with strong focus on data protection and confidentiality. Each Ministry and unit passes internal orders to develop the general protocol and prepares a report for the Service Inspection Unit for possible proceedings and sanctions. Annual submission of cases and data is required; protocol has been updated in October 2024.
- **Switzerland:** The **procedure** is defined for the entire federal administration and **formalized in official guidelines**. The framework distinguishes between **informal and formal procedures** and provides guidance and recommended steps for persons concerned. According to the respondent, the procedures in place appear to be effective, as the number of reported cases is low.

Has your country established a central and dedicated mechanism or body to handle harassment complaints in the public sector?

What is its composition and main role?

What types of cases can be submitted and how does the complaint process work?

To whom does the body report or submit its findings, if applicable? How is its independence ensured?

How is it perceived by civil servants in terms of trust, accessibility and effectiveness?

Question 7

Are there any other bodies or institutions at central government level that provide support or help manage harassment and conflict cases in the public sector?

What types of services do they offer and to whom are they addressed?

How do these bodies or services coordinate with each other and/or with organisations?

Question 8

Mechanisms and Supporting Bodies for Handling Harassment

Dedicated Bodies

None of the countries reviewed has a body exclusively dedicated to harassment. Instead, harassment is addressed within broader frameworks such as equal treatment, anti-discrimination, ethics, or disciplinary systems. For example, Austria's Federal Equal Treatment Commission handles harassment under its equal treatment mandate, Portugal's General Inspectorate of Finance (IGF) addresses harassment within its broader inspection, oversight and reporting mandate and Romania's National Council for Combating Discrimination (CNCD) treats harassment as a form of discrimination. Overall, harassment is approached as a cross-cutting issue rather than through stand-alone institutions.

Centralized Mechanisms

Several countries operate relatively centralized arrangements combining **advisory, preventive, and investigative functions**, while **binding decision-making powers are generally limited** or assigned to **disciplinary bodies**. The degree of centralization and scope of competences vary across systems.

Decentralized Mechanisms

Other countries rely primarily on decentralized approaches, where **responsibility lies with individual institutions or ministries** within a national framework. These systems emphasise **internal procedures, early intervention and case-specific handling**, with **external oversight bodies** providing support or review.

Complementary Support Structures

Primary mechanisms are commonly complemented by additional actors such as **ombuds institutions, equality bodies, inspectorates, ethics councils and support services**. These bodies generally play advisory or preventive roles rather than acting as formal decision-making authorities.

Mechanisms and Supporting Bodies for Handling Harassment

Examples by country:

- **Albania:** Albania has not established a central mechanism for harassment complaints in the public sector. Complaints are handled **within each institution** in accordance with the **general framework** set out in the guide for the prevention and addressing of violence, harassment and sexual harassment in the workplace.
- **Austria:** Harassment complaints are handled by the **Federal Equal Treatment Commission (B-GIBG)** under the Ministry for Women, Science and Research. The Commission consists of two senates with representatives from the Federal Chancellery, labour and civil service law experts and trade unions. It issues **expert opinions, recommends corrective measures and acts independently** by law. Complaints may be submitted by civil servants, applicants, Equal Treatment Officers or initiated by the Commission itself. Opinions are published anonymously and can serve as evidence in legal proceedings. Additional bodies include **Equal Treatment Officers, working groups, women's representatives, staff representatives and an interministerial working group**; these provide advice, handle complaints, propose measures and coordinate mainly through collegial exchange rather than formal central steering.
- **Belgium:** Harassment is handled by **prevention advisers** for psychosocial aspects. **Formal procedures** exist for **psychosocial risks, violence, harassment and unwanted sexual behaviour**. Prevention advisers investigate cases, interview the parties involved and witnesses, and prepare a report including analysis and proposed preventive measures. The report is submitted to the **employer, who is responsible for taking action**. Prevention advisers have an independent status. Additional bodies: The **Occupational Health and Safety Inspectorate** and **labour courts** may intervene; coordination is limited due to confidentiality requirements.

Mechanisms and Supporting Bodies for Handling Harassment

- **Croatia:** There is no single centralised body exclusively dedicated to harassment complaints in the public sector. A **standardised framework** applies across state bodies under the Collective Agreement, with complaints handled mainly by **confidential advisors at organisational level**. An **Ethics Commission** exists as an independent body with a decision-making and advisory role on ethical conduct, while overall oversight includes **reporting obligations** to a **Joint Commission**.
- **Czech Republic:** There is no single centralised body exclusively dedicated to harassment complaints in the public sector. The system is **decentralised**, with cases mainly handled by **individual authorities** and external institutions such as the **Public Defender of Rights** and the **State Labour Inspection Office**, both of which have limited and separate powers. According to the inputs, cases are often underreported and victims may be referred between institutions without effective resolution.
- **Estonia:** There is no central body for harassment complaints. The **employer is responsible for handling cases**. If the employer fails to act or refuses to do so, employees may contact the **Labour Inspectorate** for counselling and supervision of compliance with occupational health and safety regulations. The **Ministry of Finance** coordinates public service personnel policy and develops methodologies and training materials to promote ethical leadership and workplace well-being. The **Public Service Ethics Council** provides assessments related to ethical conduct but does not handle complaints.
- **France:** Harassment cases are handled through **internal mediation and conciliation mechanisms** and by the independent **Défenseur des droits**. Also uses mandatory pre-court mediation for certain disputes and a hospital system with local, regional and national mediators.

Mechanisms and Supporting Bodies for Handling Harassment

- **Greece:** As defined in the Ministerial Decision, the **Ombudsman** and the **National Transparency Authority** are external bodies competent to examine harassment complaints together with the **internal body (Integrity Advisor or HR Manager)**. The Integrity Advisor has a mediating role and decides whether the complaint should be referred to an external body or to the competent disciplinary bodies, while working under the **Code of Conduct for Integrity Advisors** with independence ensured through high-standard selection criteria and performance requirements. Complaints are examined for admissibility and validity, investigated, and forwarded to the competent disciplinary authority. **Disciplinary bodies within organisations** impose sanctions and coordination between internal and external bodies is formalised. There are no other bodies at central government level, since harassment constitutes a disciplinary offence.
- **Italy:** There is no single central body. Each public administration must establish a **Comitato Unico di Garanzia (CUG)** to promote equal opportunities, well-being at work and prevent harassment. Employees may contact the **Consigliera o Consigliere di Parità (Equality Counselor) at provincial or regional level**, an **independent authority** that supports victims and may initiate or support legal action. Complaints may also be addressed to the **employer or hierarchical superior**, who can initiate disciplinary proceedings; criminal cases are reported to **judicial authorities**. Additional bodies: Coordination occurs through referrals and information-sharing between **CUGs, Equality Counselors, HR offices** and **central departments**.
- **Latvia:** There is no central and dedicated mechanism for harassment complaints in the public sector. The **State Labour Inspectorate** may evaluate whether an employer has violated obligations to ensure a safe working environment.

Mechanisms and Supporting Bodies for Handling Harassment

- **Poland:** Disciplinary proceedings under **civil service law** cover various issues, including harassment and conflict. First-instance cases are handled by **disciplinary commissions at office level**, while appeals are reviewed by the **Higher Disciplinary Commission of the Civil Service (WKDSC)**. Its main role is to examine appeals and it may uphold, amend, repeal or refer decisions back. Members act independently and are bound only by final court judgments. Additional bodies include the **National Labour Inspectorate**, which monitors compliance and promotes safe working conditions and the **Ombudsman**, which oversees the protection of citizens' rights.
- **Portugal:** The **General Inspectorate of Finance (IGF)** handles harassment complaints in the public sector. It investigates cases, proposes protective measures and refers matters to the **Public Prosecutor** when required. Complaints may involve moral, sexual, or other harassment and follow stages of receipt, analysis, processing, and conclusion. IGF's **independence** is guaranteed by law. Additional bodies include **CIG**, which promotes **gender equality** and offers an online tool (questionnaire + discussion) to prevent sexual harassment, and **CITE**, which promotes **equality in employment** and refers mediation to the Justice Ministry's RAL+ platform. Both forward complaints involving crimes under the Penal Code to the **Public Prosecutor**. The **Bar Association** also provides legal advice and mediation.
- **Romania:** The **National Council for Combating Discrimination (CNCD)** is an independent authority under parliamentary control, enforcing anti-discrimination law, harmonising acts and developing public policies in this field. Its duties include prevention, mediation, investigation and sanctioning of discrimination, monitoring cases, and victim assistance, acting on complaints or ex officio. The **Annual Report on the Management of the Civil Service** tracks gender distribution and anti-discrimination measures in recruitment. The **National Agency for Gender Equality between Women and Men (ANES)** promotes the principle of equality of opportunity and treatment, with a view to eliminating discrimination based on sex / promoting equality between women and men in national policies and programmes.

Mechanisms and Supporting Bodies for Handling Harassment

- **Serbia:** Harassment complaints may be addressed through the **Republic Agency for Peaceful Settlement of Labour Disputes**. The Agency is an **independent public institution** providing free and impartial resolution of individual and collective labour disputes, including harassment and discrimination. It uses conciliation for collective disputes and arbitration for individual cases, with legally binding awards. Proceedings are voluntary (except in essential services), confidential and time-limited.
- **Slovenia:** There is no (centralized) body for handling harassment complaints in the public sector.
- **Spain:** Royal Decree 247/2024 of 8 March adopts an **Action Protocol against sexual harassment and harassment based on gender** in the General Administration of the State and its public bodies. **Each ministry or public body** has the duty to protect employees' freedom and integrity and handle cases under this protocol. Negotiations with **trade unions** at general level include sharing information on these issues. The public health system, managed by the 17 Autonomous Regions, addresses possible health consequences of harassment, including issuing medical leave.
- **Switzerland:** At central government level, several bodies provide support and assistance in cases of sexual or moral harassment, including the staff social consultation service, the federal mediation service, the **conciliation commission** for federal staff, and whistleblowing channels managed by the Federal Audit Office. These bodies offer counselling, mediation, conciliation and reporting mechanisms and operate alongside internal procedures defined for the federal administration.

III. Challenges and Best Practices



In your opinion, what are the main challenges in preventing and managing harassment or conflict, or in applying the legal framework in practice?

Question 9

Main Challenges

The main challenges arise in the prevention of harassment, such as through **insufficient training, manager responsibility and cultures where harassment is tolerated**. Further challenges arise in the **reporting process through legal complexities, investigation difficulties and organisational issues**.

Insufficient Training and Guidance

- Lack of **obligatory training** for all and lack of **systemic guidance/handbook** (Croatia).
- **Limited awareness** among staff and **uneven implementation of frameworks** (Albania).
- Poor knowledge of **professional conduct rules** and of **consequences of non-compliance** (Romania).
- Lack of clarity in **policies and procedures** (Portugal).
- Insufficient knowledge or misunderstanding of **internal legislation, acts, and procedures** (Poland).

Lack of Managerial Responsibility and Engagement

- **Hierarchical lines** must understand **responsibilities and legal obligations** (Belgium).
- **Managers who trivialize issues**, show **lack of empathy**, and **normalize inappropriate behaviour** (Czech Republic).
- Challenges in ensuring that **managers take complaints seriously**, act as role models and do not tolerate disrespectful or discriminatory behaviour (Switzerland).

Cultural and Social Barriers

- **Fear of reporting** and **culture of silence** (Czech Republic, Portugal, Albania, Latvia).
- **Work environments tolerating abusive behaviour** and **fear of unintended consequences when initiating procedures** (Portugal).
- Need to **encourage safe reporting** and **denunciation** (Spain).
- There is some lack of knowledge in agencies that, due to **societal changes**, are becoming more exposed to the problem (Sweden).

Main Challenges

Legal and Procedural Complexity

- **Fragmented legislation** and ineffective solutions that worsen situations. **Lack of networking and information sharing** prevents comprehensive victim support (e.g., linking legal, psychological, and health care). **Authorities act independently**, with non-overlapping powers and **victims are often referred between institutions** without resolution (Czech Republic).
- Problems defining relevant terms and ensuring **impartiality and trustworthiness** (Greece).

Organizational and Structural Issues

- **Decentralization** causing **inconsistent handling and competencies** (Estonia).
- **No external supervision** foreseen in the legal framework (Slovenia).
- **Ensuring continuity** and **avoiding overlaps of responsibilities** or **conflict of interest** (Serbia).

Evidence and Investigation Challenges

- Problems with **collecting proof and supporting victims** (European Commission, Czech Republic, Latvia).
- **Insufficient capacity** to investigate and prevent harassment (Czech Republic).

Can you share one or two concrete examples of actions or practices in your organisation that seem to work well in preventing or managing conflict and harassment?

Question 10

Best practices

Best practices include prevention efforts through **training and awareness-raising activities**, including for managers, supporting a **psychologically safe working environment**. Concrete measures such as **clear procedural steps** and defined **support arrangements** for victims are commonly part of anti-harassment approaches.

Training and Awareness

- Lectures and workshops on **well-being and stress management**, offered through occupational psychology counselling (Austria).
- Courses on **sensitization in each Ministry/public body** (Spain).
- Internal training on **values and ethics** (Latvia)

Psychological Support and Well-being

- **Anonymous occupational psychology counselling**, provided externally or in-house (Austria).
- Access to a **supporting psychologist** and **HR team support** (Estonia)
- **Team of psychologists** providing clarification and support (Portugal).

Clear Procedures and Reporting Channels

- Existence of a **reporting channel for complaints** (Portugal).
- Absence of reported conflict or harassment cases may be linked to the **existing legal and by-law framework and internal procedures**, notifications and reminders provided to employees (Serbia).
- **Procedures** described in the same way for all public organisations in the relevant **legal framework**, with **Integrity Advisors** taking up their duties to introduce further awareness-raising and prevention policies (Greece).

Best practices

Structured Methodologies and Tools

- Use of **psychosocial risk analysis** results to raise awareness among the hierarchical line and inform staff about procedures and options for action in bullying cases (Belgium).
- Development of methodologies for the prevention and resolution of sexual harassment, including the establishment of a **crisis team, diagnosis and resolution strategies**, as part of the “Dignified Workplace” project (Czech Republic).
- **Anonymous questionnaires** conducted to assess the situation in response to a publicized sexual harassment case (Czech Republic).
- New guidance and measurement of civil servants’ well-being using **standardized surveys and harassment KPIs in plans and reports** (Croatia).
- **Regular** use of **employee engagement surveys** support prevention efforts (Latvia).

Promoting Organizational Culture

- **Evolving case law** has provided increased legal clarity on harassment, while **advisory and outreach activities** support managers in addressing workplace conflicts and identifying when third-party assistance is needed (European Commission).
- **Promotion of transparency and openness** to prevent cases from arising (Portugal).
- **Ethical advisors** promoting integrity, advising staff, and identifying areas for improvement (Poland).
- **Support from trade unions** through negotiation and information-sharing on **anti-harassment measures**. (Spain).

IV. Key Takeaways



Key Takeaways

The following key takeaways reflect transversal patterns from country responses and do not constitute an assessment of effectiveness.

- **Formal and informal routes** – Combining formal and informal routes may support earlier engagement and resolution. Where confidential counselling or mediation complements formal reporting, entry points may be perceived as more approachable and issues may de-escalate earlier.
- **Leadership engagement** – Visible leadership engagement can reinforce prevention policies in daily practice. Explicit managerial involvement and training may help signal expectations and support the day-to-day uptake of prevention measures.
- **Targeted training** – Systematic, role-specific training may support greater consistency across organisations. Structured programmes, particularly for managers and when integrated into onboarding or leadership development, can support a shared understanding of procedures and expected behaviours.
- **Monitoring and follow-up** – Monitoring tools are most effective when linked to follow-up and learning processes. Linking surveys and psychosocial risk assessments to action plans, timelines and supervisory follow-up may increase their practical value.
- **Strategic integration** – Integration within broader strategies can enhance coherence. Embedding harassment and conflict prevention within wider well-being, equality or occupational safety strategies may help align objectives and responsibilities.
- **Practical guidance** – Clear guidance and ready-to-use tools, including materials supporting early dialogue or counselling, may reduce variability in implementation. Handbooks, templates and communication materials can support the translation of policy into practice, particularly in decentralised settings.
- **Consistent application** – While procedures are widely in place, consistent application may represent a key area for further progress. Attention may increasingly focus on clarity of steps, defined responsibilities and predictable follow-up rather than on creating new frameworks.

Contact: service-relationsinternationales@mfp.etat.lu