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Gender Neutrality In Workplace Sexual Harassment Laws

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Introduction

From sexual coercion to sexual annoyance, sexual harassment in the workplace transpires in various forms and gravely affects the well-being of an employee. As per the definition offered by the Declaration of Fundamental Principles and Rights at work, ILO¹ workplace harassment takes place in two forms:

1. Quid Pro Quo: A job benefit like a pay raise, promotion, or continued employment is made contingent on acceding to demands for sexual favours.
2. Hostile working environment: Working conditions are made intimidating or humiliating for the victim.

As a result, workplace harassment should not be solely perceived as a few misguided or malicious etiquettes. It finds its roots in the prevalent and persistent structural problems that are linked to decision-making authorities vested with certain individuals.

The Indian legislature has applied a straight-jacket formula to the concept of workplace harassment. Even though the Sexual Harassment at Workplace (Prevention, Prohibition and Redressal) Act and Rules, 2013 (herein referred to as the POSH Act)² can be regarded as a 'good law', that covers all the requisite bases, from laying down an extensive definition of sexual harassment to setting up a grievance committee, it is lacking in identifying workplace harassment as a phenomenon with interspersing social, cultural, power-related, relationship-related and gender and sexuality-related factors. It further alienates other gendered individuals and men from experiencing the effects of this violation of human rights.

A recent study by the University of Washington reaffirms this prejudice of victimization; women who are young, "conventionally attractive" and appear and act feminine are more likely to be believed when making accusations of sexual harassment, while people who don't fit the prototype potentially face greater hurdles when trying to convince a workplace or court that they have been harassed³. However, data from the US Equal Employment Opportunity⁴ tells a different story. Out



of the complaints received in the past 6 years, an average of 16.5% of charges were filed by men, thereby shattering the commonly held prejudice against male victims of sexual harassment. The figure may not constitute the majority of the complainant pool, but it is significant in number.

An article in *The Hindu*⁵ offers an insightful narrative of male victims of workplace harassment in the country; apart from the absence of effective legal recourse, one of the key issues faced by male victims is the lack of sympathy and acknowledgement of their plight by the law enforcement agencies as well as their fellow workers, because the idea of a male victim of sexual harassment seems absurd to the masses.

On a similar note, the transgender community, being one of the most marginalised segments in the country, also suffers from the same ignorance by the law. As per the first ever study conducted by the National Human Rights Commission on the human rights of transgenders in India, 92% of transgenders are deprived of the right to participate in any form of economic activity in the country, compelling them to beg or choose sex work⁶. The study is inclusive of various case studies that enumerate the instances of discrimination and harassment faced by them at the workplace. To remedy the centuries of exploitation and degradation, The Transgender (Protection of Rights) Act, 2019 (herein referred to as the Act) was implemented. Under Section 18 of the Act, sexual abuse against a transgender person by any person is a punishable offence. However, it fails to identify and lay down what constitutes sexual abuse against such individuals⁷. It is pertinent to observe here that POSH recognises sexual harassment complaints filed by 'aggrieved woman'. Therefore, transgenders who identify themselves as females can claim remedy under POSH against workplace harassment.

The 'male on female paradigm' of the workplace harassment law can be owed to the previously skewed gender ratios in the country's workforce. However, according to the Women in Business, 2021 report compiled by the global accounting and consulting firm Grand Thornton, the percentage of women in senior management for India stood at 39 per cent, as against the global average of 31 per cent, signalling a reality irreconcilable with the commonly held notions of women in power. Further, as per the India Skills Report, in 2021 women account for 36% of the workforce in the country, a participation which stands at its highest in the previous five years, indicating a positive structural change in the future⁸. Since workplace harassment is a phenomenon associated with power more than sexual attraction, it would not be incorrect to conclude that women are also capable of inflicting harassment on their subordinates.

Multinationals and corporates in India have recognised the changing social dimensions of gender and sex, thereby expanding their employee welfare schemes and workplace harassment policies for the benefit of all individuals. Some of these companies are:

1. Godrej: The company is a firm believer in respecting individuals as they are, in their true and 'whole' sense.⁹
2. India Inc.: The company has given the 'male model of ambition' a burial and has begun to operate on gender fluid and inclusive policies¹⁰.
3. The Taj Group of Hotels: The workplace harassment policy of the hotel chain reads, "We are determined to promote a working environment in which people of both sexes work and complement each other as equals in an environment that encourages maximum productivity".¹¹
4. Tech Mahindra Foundation: The sexual harassment at work policy of the foundation enumerates its objective to provide a secure and enabling environment to all its employees and associates. The foundation seeks to establish a workplace that is gender-sensitive and recognises men, women, and third genders as equal players in the society.¹²
5. L'Oréal India: The FMCG Company has received EDGE (Economic Dividends for Gender Equality) certification for the third time in 2019¹³.

This piece intends to draw an insightful parallel between the sexual harassment at workplace laws across the world and the present state of affairs in India, thereby offering a substantial way forward.

Global Overview of Workplace Sexual Harassment Laws

SOUTHEAST ASIA

Singapore

Currently, sexual harassment at work is not governed by specific legislation, unlike in India. However, the Penal Code and Protection from Harassment Act, 2014 (POHA), cover physical and non-physical types of harassment.

The object of the POHA is not to penalise workplace sexual harassment per se but to provide a statutory instrument protecting individuals against harassment in general.

Section 3 of POHA provides as under:

No person shall, with intent to cause harassment, alarm, or distress to another person, by any means-

- 1. use threatening, abusive or insulting language or behaviour*
- 2. make any threatening, abusive or insulting communication*
- 3. publish any identity information about the target person or a related person of the target person.*

And as a result, causing the target person or any other person (each called in this section the victim) harassment, alarm or distress¹⁴."

Additionally, the following illustration under the statute gives an example of workplace harassment, thus indicating that such conduct is covered under the ambit of POHA:

- (a) X and Y are co-workers. At the workplace, X loudly and graphically describes to the other co-workers X's desire for a sexual relationship with Y in an insulting manner. X knows that Y is within earshot and intends to cause Y distress. Y is distressed. X is guilty of an offence under this section.¹⁵*

POHA also contains provisions relating to offences involving words or gestures intended to insult the modesty of a woman and assault or use of criminal force to a person with the intent to outrage the person's modesty as under:

354.— (1) *Whoever assaults or uses criminal force to any person, intending to outrage or knowing it to be likely that he will thereby outrage the modesty of that person, shall be punished with imprisonment for a term which may extend to 2 years, or with fine, or with caning, or with any combination of such punishments*¹⁶.

The Ministry of Manpower, Singapore, approaches the issue of sexual harassment at the workplace in the following manner¹⁷:

Workplace harassment can occur when one party at a workplace demonstrates behaviour that causes or is likely to cause harassment, alarm, or distress to another party.

Examples of behaviour that may be harassment include:

- *Threatening, abusive, or insulting language, comments or other non-verbal gestures*
- *Cyberbullying*
- *Sexual harassment*
- *Stalking*¹⁸

The Ministry has also issued a '*Tripartite advisory on managing workplace harassment*'¹⁹ that aims to serve as a practical guide for employers and employees to prevent, manage and combat instances of harassment in the workplace. It emphasises the importance of establishing a proactive management system to build a safe and conducive workplace.

The advisory maintains that workplace harassment can be directed at and/or carried out by:

- Co-workers
- Managers and workers
- Other people at the workplace, e.g., customers, contractors, interns, and volunteers.

In conclusion, the laws against workplace harassment in Singapore are gender neutral, thus providing a holistic statutory protection to every individual against workplace harassment. It can

also be sufficiently noted that workplace harassment is treated as one facet of a broader concept of harassment that is sanctioned through criminal self-help measures available in the country.

Malaysia

In contrast to India, Malaysia does not have a dedicated legislation to tackle sexual harassment in the workplace at present. However, the Ministry of Human Resources, in 1999, adopted the Code of Practice on the Prevention and Eradication of Sexual Harassment in Workplace²⁰ (Code) with the objective of laying down a practical guide to tackle workplace harassment for its citizens. The Code enumerates exhaustive and comprehensive in-house mechanisms and the necessity for a complaint or grievance procedure to combat the issue.

The Code defines sexual harassment as “any unwanted conduct of a sexual nature having the effect of verbal, non-verbal, visual, psychological or physical harassment:

(a) that might, on reasonable grounds, be perceived by the recipient as placing a condition of a sexual nature on her/his employment.

(b) that might, on reasonable grounds, be perceived by the recipient as an offence or humiliation, or a threat to his/her well-being, but has no direct link to her/his employment”.

It is pertinent to note that the Code did not have any binding effect on employers. However, the Employment (Amendment) Act 2012²¹ made it compulsory for organisations to actively take measures to combat and curtail workplace harassment. The Act makes it mandatory for an employer to inquire into a complaint of sexual harassment by an employee, within 30 days of receipt of the complaint.

The victims can also seek protection against sexual harassment under the Malaysian Penal Code²² under Section 509, which criminalises offences which insult the modesty of any person. Words, gestures, or objects which are seen to intrude upon the privacy of a person are also covered under the section.

If an individual is dismissed unfairly from their job due to sexual harassment, Section 20 of the Industrial Relations Act 1967²³ provides statutory relief to the victim and assists them to get

reinstatement or compensation in lieu of such harassment and disadvantaged treatment through the Industrial Relations Department if it is proven unjust.

Under the Malaysian laws, remedies and provisions against sexual harassment in the workplace are essentially in place. However, there is a lack of a streamlined and exhaustive statute under which the victims can seek remedy. However, the Code is applicable to both men and women, while the Penal Code and Industrial Relations Act, and Employment (Amendment) Act, 2012 use gender-neutral terms to refer to victims.

Curiously, the Anti-Sexual Harassment Bill, 2021 (herein referred to as the “Bill”) was tabled on 15th December 15th, 2021, by Deputy Minister Datuk Siti Zailah Mohd Yusoff for first reading. On March, 2022 the Joint Action Group for Gender Equality, ENGENDER Consultancy and Young Women Making Change had a meeting with the Minister and representatives from the Ministry of Women, Family and Community Development, Special Advisor on Law and Human Rights to the Prime Minister, members of the Parliamentary Special Select Committee on Women and Children Affairs and Social Development (PSSC), drafters and advisors from the Attorney-General’s Chambers (AGC) to table their concerns and recommendations on the Bill and communicate legal justifications for the proposed amendments with the objective of establishing a more comprehensive legislation²⁴.

Some of these recommendations include a protection clause for the complainants to prevent bullying and harassment by the perpetrator, broadening the definition of ‘organization’ to include universities, public transport service providers, and organisation administrators within the ambit of the law; and broadening the meaning of “sexual harassment” to cover instances where even though the harassment is not directed at an individual, but a hostile, offensive, or intimidating working environment is created.²⁵

UNITED STATES OF AMERICA

In the United States, workplace sexual harassment is considered a form of sex discrimination, and therefore, such harassment is declared illegal across the country. The federal laws governing sexual harassment in the workplace are only applicable to employers with fifteen or more employees.

1. Title VII of the Civil Rights Act of 1964²⁶

The Act protects employees and job applicants from employment discrimination based on race, colour, religion, sex and national origin. Therefore, Title VII protection covers every aspect of employment decisions, from recruitment, selections, and terminations to other decisions concerning terms and conditions of employment.

2. The Equal Pay Act of 1963²⁷

Protects men and women from sex-based wage discrimination in the payment of wages or benefits, who perform substantially equal work in the same establishment.

The Code of Federal Regulations reads as under²⁸

Harassment on the basis of sex is a violation of Section 703 of Title VII. Unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment,
- (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, or
- (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

As per the U.S. Equal Employment Opportunity Commission, harassment does not have to be limited to sexual harassment only. It can include offensive remarks about a person's sex.

The law doesn't prohibit simple teasing, offhand comments, or isolated incidents that are not very serious. Harassment is illegal only when it is so frequent or severe that it creates a hostile or offensive work environment or when it results in an adverse employment decision (such as the victim being fired or demoted).

The harasser can be the victim's supervisor, a supervisor in another area, a co-worker, or someone who is not an employee of the employer, such as a client or customer.

Further, in March 2022, President Joe Biden signed the "*Ending Forced Arbitration of Sexual Assault and Sexual Harassment Act of 2021*²⁹" into effect, thus invalidating the mandate to arbitrate cases

of sexual harassment. The law does not nullify a prior arbitration agreement but extends the ability of the victims to proceed directly to the court.

The United States has a streamlined legal framework in place to tackle workplace harassment. The protection of the law is extended to victims of every gender. However, it is important to note that isolated incidents of unwelcome comments, teasing etc are not included within the meaning of sexual harassment. The incidents of harassment must be continuing in nature, resulting in a hostile working environment. Additionally, the laws specifically put the onus on the employer to ensure that their workplace has a zero-tolerance policy towards such conduct and mandate them to implement strict regulations to prohibit, manage, and combat such incidents.

AUSTRALIA

The Australian Human Rights Commission defines sexual harassment as:

Sexual harassment is an unwelcome sexual advance, unwelcome request for sexual favours or other unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated, where a reasonable person would anticipate that reaction in the circumstance³⁰.

The issue of workplace harassment is covered under the Sex Discrimination Act, 1984, according to which:

28B Employment, partnerships etc.

(1) *It is unlawful for a person to sexually harass:*

(a) *an employee of the person; or*

(b) *a person who is seeking to become an employee of the person.*

(2) *It is unlawful for an employee to sexually harass a fellow employee or a person who is seeking employment with the same employer.*

(3) *It is unlawful for a person to sexually harass:*

(a) *a commission agent or contract worker of the person; or*

(b) a person who is seeking to become a commission agent or contract worker of the person.

(4) It is unlawful for a commission agent or contract worker to sexually harass a fellow commission agent or fellow contract worker.

(5) It is unlawful for a partner in a partnership to sexually harass another partner, or a person who is seeking to become a partner, in the same partnership.

(6) It is unlawful for a workplace participant to sexually harass another workplace participant at a place that is a workplace of either or both of those persons³¹.

Additionally, **Section 28A of the Sex Discrimination Act 1984**³² defines sexual harassment as when a person makes an unwelcome sexual advance, an unwelcome request for sexual favours, or engages in other unwelcome conduct of a sexual nature in relation to a person. This occurs in circumstances where it is possible that the person harassed would be offended, humiliated or intimidated. Sexual harassment can be subtle and implicit rather than explicit.

Under Australian law, sexual harassment does not have to be a pattern or continuing behaviour. Further, behaviour that, while not directed at a particular person, affects someone who is exposed to it or witnesses it (such as overhearing a conversation or seeing sexually explicit posters in the workplace) can also fall under the ambit of sexual harassment.

Employers have a common law duty to take reasonable care for the health and safety of their employees, as well as additional duties under federal and state or territory work health and safety legislation. An employer's duty of care to its employees may be breached if bullying or harassment (including sexual harassment) occurs within the workplace. Employers should be aware of the obligations and duties set out in relevant work health and safety legislation in each state and territory³³. Safe Work Australia³⁴ also provides a workplace sexual harassment guide based on the model Work Health and Safety (WHS) laws. These laws have not been implemented in all jurisdictions, although other Australian WHS laws have similar duties.³⁵

Therefore, it can be concluded that, under the legal mandates in Australia, sexual harassment is a recognised offence and employers are specifically held vicariously liable under the law if they fail to undertake sufficient steps to tackle such complaints. The laws are gender neutral to ensure an umbrella of protection for every citizen against the act of sexual harassment. All employers should

have a sexual harassment policy, provide anti-harassment training to all workplace participants, and have procedures for dealing with internal sexual harassment complaints, in order to demonstrate “all reasonable steps” and discharge liability in line with the provisions of Section 106 of the Sex Discrimination Act. A lack of awareness of the occurrence of such harassment at their workplace is not a reasonable defence under the law.

EUROPE

France

In France, the issues of workplace harassment are dealt with under the Labour Code. **Article L. 1153-1 § 1** of the Labour Code defines sexual harassment as repeated acts or conduct with a sexual connotation that either violates the dignity of the employee because of its degrading or humiliating nature or creates an intimidating, hostile, or offensive situation against him/her³⁶

Further, **Article L. 1153-1 § 2** of the Labour Code further expands that, such harassment is also inclusive of the act of exerting any form of serious pressure, even if not repeated, for the real or apparent purpose of obtaining an act of a sexual nature, whether it is sought for the benefit of the perpetrator or for the benefit of a third party.

In 2015, the law introduced the notion of sexist act in employment (*agissement sexiste*)¹³ that defined workplace harassment as *any act linked to the sex of a person with the purpose or effect of violating her/his dignity or creating an intimidating, hostile, degrading, humiliating and offensive environment*³⁷.

Finally, since 2019, in companies employing at least 250 employees, someone has to be appointed as a “sexual harassment officer³⁸”. In every company that has a Social and Economic Committee, such an officer is also designated by the Committee from within its members.

In March 2022, amendments to the “*Code du Travail*” were introduced, according to which sexist comments at workplace are now covered within the meaning of sexual harassment³⁹. The amendment covers both isolated and repeated cases of sexist remarks and behaviour. It is interesting to note that, under French law, sexual harassment does not have to be intentional to hold the perpetrator accountable for making sexist remarks.

Therefore, the workplace harassment laws in France are inclusive of individuals of the binary genders, leaving transgenders out of the ambit of the law. Workplace harassment has not been confined to a continuous form of offensive behaviour, but also includes one-off incidents. It is interesting to note that even though the protection of the law is only guaranteed to male/female victims, a harasser can be an individual of any gender.

Germany

Sexual harassment in the workplace is prohibited under Section 2 (1 lit. 1 - 4) of the General Equal Treatment Act of 2006 (*Allgemeines Gleichbehandlungsgesetz*). The legal definition of sexual harassment in Section 3(4) of the General Equal Treatment Act is *“unwanted conduct of a sexual nature, including unwanted sexual acts and requests to carry out sexual acts, physical contact of a sexual nature, comments of a sexual nature, as well as the unwanted showing or public exhibition of pornographic images, which takes place with the purpose or effect of violating the dignity of the person concerned, in particular where it creates an intimidating, hostile, degrading, humiliating or offensive environment.”*

According to Section 12 (1) of the General Equal Treatment Act⁴⁰, employers are bound to undertake preventive measures to protect employees from sexual harassment. However, the Act does not lay down specific measures and, hence, it is open to the prudence of the employers.

Under Section 14 of the General Equal Treatment Act, an employee affected by sexual harassment is entitled to refuse work without loss of pay if the employer does not undertake proactive measures to tackle sexual harassment in the workplace.

Therefore, the laws tackling workplace harassment in Germany are gender neutral in nature. In addition, it is also interesting to note that, employers are specifically made responsible for ensuring a robust and safe working environment for their employees.

Italy

Art. 26 of the Code of Equal Opportunities between Men and Women - Legislative Decree No. 198/2006⁴¹ deals with workplace harassment in Italy and defines sexual harassment as:

Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature, with the purpose or effect of violating a person's dignity, or by creating an intimidating, hostile, degrading, humiliating or offensive environment. Sexual harassment is a form of discrimination⁴².

This definition is the same found in art. 2.1.d of the European Union's Directive 2006/54/EC⁴³ The Code states that companies, trade unions, employers and workers shall commit to establishing a working environment wherein the dignity of each person is respected, and interpersonal relationships are encouraged, subject to principles of equality and mutual respect.

UNITED KINGDOM

In the U.K., the Equality Act 2010⁴⁴ addresses the issue of sexual harassment and defines the act as *"unwanted conduct which violates someone's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment"*⁴⁵.

In addition to the abovementioned general prohibition on harassment, Section 26 of the Equality Act 2010 specifically prohibits three types of harassment in relation to the protected characteristic of sex:

- sex-related harassment i.e., unwanted conduct related to the protected characteristic of sex
- harassment of a sexual nature i.e., unwanted conduct of a sexual nature
- less favourable treatment based on a person's rejection of, or submission to, sex-related harassment or sexual harassment.

A consultation in 2019 also considered introducing several changes in order to tighten up the law on workplace harassment. In January 2020 the UK Equality Body, the Equality and Human Rights Commission (EHRC), published *technical guidance*⁴⁶ on workplace harassment, which it is anticipated will form the basis of a statutory code of practice when the government publishes its response to the 2019 consultation⁴⁷. The EHRC has also published Guidance on the misuse of Non-Disclosure Agreements (NDAs) or confidentiality clauses in discrimination cases⁴⁸.

The Takeaway

In conclusion, various countries across the world consider workplace harassment a vice that can potentially victimise individuals of all genders. Except for France and Malaysia, which have restricted the applicability of their Labour Code and Code of Practice on the Prevention and Eradication of Sexual Harassment in the Workplace to men and women, all the other countries apply gender neutral terms like *person/target person* to address the survivor as well as the harasser, thereby extending statutory protection to every employee/prospective employee, irrespective of gender and sex.

However, in a stark contrast, India's workplace harassment law is women-centric, lacking any space for the grievances of trans people, individuals of the LGBTQI+ community, and men. It is crucial to note here that, under Section 9 of the POSH Act, same gender complaints are not precluded, thus identifying females as perpetrators as well.

The lack of gender neutrality in the law can be attributed to the historically prevailing power imbalances between cis-males and females. However, despite numerous watershed moments in dialogues surrounding gender equality in the country, the legislature, fairly recent in its inception, has failed to acknowledge the presence of other genders and sexualities in the workplace.

In **Criminal Justice Society of India v. Union of India & Ors**⁴⁹ the Supreme Court of India found merit in the plea of the petitioner which maintained that men, transgender, homosexual and bisexual people find themselves "*sequestered from the point of view of victims of rape under the existing penal laws of the country, despite an impending need for the same*"⁵⁰ Consequently, in 2019, The Criminal (Amendment) Bill 2019⁵¹ was introduced in the Rajya Sabha with the objective of extending gender neutrality to various penal provisions, but it still remains lost in the legislative quagmire.

The closest India has come to concretely implementing gender neutral workplace harassment regulations is the University Grants Commission (UGC) (Prevention, prohibition, and redressal of sexual harassment of women employees and students in higher educational institutions) Regulations⁵² notified in May 2016. As per UGC's provision, sexual harassment is gender neutral; male students are as vulnerable to such harassment as their female and transgender counterparts.

Ways to Address

A meta-analysis of the antecedents of workplace harassments concludes that organisational tolerance is the key factor in determining the occurrence and frequency of sexual harassment at a workplace⁵³. Best practices to combat and completely eradicate workplace harassment are still in development. However, employers in India can incorporate the following measures to ensure an inclusive and robust workplace environment.

Formulating a gender-neutral sexual harassment policy

Every employer/organization can carefully craft a gender inclusive policy against sexual harassment. Although complaints filed by female survivors must be addressed in accordance with the provisions and procedures outlined in the POSH Act, complaints filed by survivors of other genders may be addressed in accordance with the policy procedures. India has ratified the Discrimination (Employment and Occupation) Convention, 1958⁵⁴. The convention addresses discrimination in employment on a number of grounds, including sex and requires the member states to pursue policies that promote equality of opportunity and treatment. Therefore, organisations and employers can refer to various international workplace harassment redressal policies in their attempt to promote a gender inclusive work environment.

Creating a positive workplace:

Apart from implementing a watertight and strict anti-sexual harassment policy, the organization/employer should promote a work culture that is characterised by a mutual respect for personal space and consideration of diversity in areas of gender, socio-economic background and

hierarchy of work relations. Management must ensure that every employee/team member feels valued to prevent alienation of certain individual/ class of individuals.

Leader's conduct:

A leader's attitude and conduct play an instrumental role in shaping the attitudes of employees. Therefore, it is absolutely imperative for team managers/leaders/partners etc. to consciously display a high standard of professional conduct.

Encourage reporting:

It is advised that the anti-harassment policy facilitates reporting and complaining through numerous routes. A survivor is more likely to find someone to confide in and share their grievance in case multiple mechanisms for reporting are implemented. For instance, victims should be able to record the details of their harasser (designation, name, department etc.) and submit a formal complaint if another such observation has been made against the same individual.

Training and workshops:

An interactive, in-person training session for the Internal Committees should be formulated. However, it should be noted that such training should be intensive and exhaustive in its approach and could last several hours and be regularly refreshed and updated with the current trends in law. Workshops for employee awareness tailored to the workplace should be formulated with repeated sessions since ingrained gender and cultural norms cannot be undone within short, one-time sessions.

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