



WOMEN IN THE MEDIA

ENDING WORKPLACE
HARRASMENT

RULEBOOK

on the prevention of
sexual and other forms of
harassment in newsrooms in
media organizations

Rulebook on the prevention of sexual and other forms of harassment in newsrooms in media organizations

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Based on Article

(insert the article and the employer's general act specifying the authority to adopt the regulations),

.....
(insert the name of the body and the name of the employer)

hereby adopts on :

Rulebook on the prevention of sexual and other forms of harassment in newsrooms in media organizations.

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GENERAL PROVISIONS

Article 1

This Rulebook regulates: the prevention and prohibition of all forms of harassment at work and in connection with work; the procedure for reporting and handling complaints; interim measures; the fact-finding procedure; sanctions; support measures for affected persons; protection against retaliation; the processing and storage of data related to the procedure; training; monitoring; and the improvement of organizational culture in the newsroom with the aim of preventing all forms of harassment (hereinafter: the Newsroom).

Article 2

This Rulebook is based on the principles of: dignity and integrity; zero tolerance of sexual harassment; prevention and timeliness; impartiality; fairness of the procedure; proportionality of measures; confidentiality; protection against retaliation; as well as on giving special importance to the specific nature of journalistic work and work in the media.

Article 3

This Rulebook does not limit the right of the affected person, in addition to addressing the employer, to seek protection before competent authorities (labour inspectorate, police, public prosecutor's office, courts, and competent independent bodies), where the applicable legal conditions are met.

If the employer becomes aware that a criminal offence has been committed against the affected person, it shall inform the affected person thereof and offer support in relation to reporting the criminal offence.

Respecting the will of the affected person, the employer shall not undertake any reporting actions before competent authorities without the consent of the affected person.

Article 4

This Rulebook shall apply to the following persons, where unwanted conduct occurs at work or in connection with work:

- a) employees employed for an indefinite or fixed-term period;
- b) persons engaged outside employment (service contracts, copyright agreements, temporary and occasional work, etc.);
- c) interns, trainees, volunteers and apprentices;
- d) persons engaged through agencies, persons employed by subcontractors, when working on the employer's premises or on the employer's project;
- e) persons from other newsrooms and organizations, where cooperation takes place within a joint assignment or event;
- f) job applicants, during the recruitment process.

Article 5

The employer undertakes to provide protection against all forms of harassment to the persons referred to in Article 4 of this Rulebook, including in contact with third parties.

For the purposes of paragraph 1 of this Article, third parties shall include interviewees, sources of information, representatives of institutions, participants in events, the public, users of social media, and all other persons with whom the persons referred to in Article 4 come into contact in the course of work or in connection with work.

The employer shall:

- a) adopt safety protocols for fieldwork and public events;
- b) include contractual clauses to prevent all forms of harassment;
- c) terminate cooperation with third parties and prohibit contact with the affected person where harassment has occurred;
- d) report harassment occurring through social media to the relevant platform.

Where the procedure prescribed by this Rulebook cannot be applied to third parties, the employer shall ensure evidence collection and take other measures provided by law, with the consent of the affected person.

Article 6

This Rulebook applies to all forms of harassment occurring in: newsroom premises, branch offices, employer's vehicles, remote work, fieldwork, business travel, training, business meetings, as well as all work-related communication (email, chat tools, telephone), including social media where connected to journalistic work or the newsroom.

TYPES OF HARASSMENT

Physical attack

Article 7

A physical attack means any unwanted, unauthorized or hostile conduct directed at a person, their body, clothing or belongings, including in particular hitting, pushing, kicking, grabbing, pinching, throwing objects, attacks with weapons, as well as damaging or destroying journalistic equipment.

Threats

Article 8

A threat means any expression of intent to cause harm, including threats of physical attack, death, sexual violence, use of weapons, attacks on family members, property, professional status or any other aspect of life.

Verbal harassment

Article 9

Verbal harassment means any oral or written expression that insults, degrades or violates the dignity of a person, particularly through insults, derogatory expressions, misogynistic, sexist and degrading comments, or by creating a hostile environment, whether directly or through ICT. It also includes hate speech.

Non-verbal harassment

Article 10

Non-verbal harassment means any behavior without the use of words that violates a person's dignity, including gestures, facial expressions, sounds, sharing or publishing photos, recordings or other content (including AI-generated content), as well as unauthorized dissemination of private information (doxing).

Sexual violence

Article 11

Sexual violence means any non-consensual act of a sexual nature, whether non-verbal, verbal, physical or digital, including coercion, pressure or abuse of position, regardless of intensity.

Violations of labour rights

Article 12

Violations of labour rights mean any conduct placing a person in a less favorable position in relation to work, particularly through discrimination in employment, assignment, promotion, remuneration and working conditions, as well as unequal treatment in allocation of tasks or opportunities. It also includes failure to act upon harassment complaints.

Smear campaigns

Article 13

A smear campaign means systematic and continuous actions aimed at damaging the reputation and professional integrity of a person through false or manipulative claims, negative propaganda or misuse of information.

Online harassment

Article 14

Online harassment includes insults, misogynistic, nationalist, homophobic rhetoric, sexualized targeting, threats, mass reporting, brigading, deepfake content aimed at discrediting, and other forms of digital violence.

PROHIBITED CONDUCT

Article 15

All forms of harassment referred to in Articles 7–14 are prohibited, regardless of whether they occur on employer premises, in the field, at social events, remote work or online communication related to work.

Article 16

Professional criticism and editorial corrections, or setting reasonable deadlines, do not in themselves constitute harassment, unless conducted in a humiliating, systematic or discriminatory manner.

PREVENTION OF ALL FORMS OF HARASSMENT BY THE EMPLOYER

Article 17

The employer shall:

- a) inform all employees about this Rulebook;
- b) appoint Commissioners and ensure the independence of the function of the Commissioner;
- c) provide training and education on the application of this Rulebook, at least once a year;
- d) ensure mechanisms for confidential reporting of harassment;
- e) ensure support measures for affected persons.

Article 18

All persons referred to in Article 4 of this Rulebook are obliged to:

- a) refrain from prohibited conduct;
- b) report to the employer serious incidents that endanger the safety of others;
- c) cooperate in the fact-finding procedure;
- d) maintain the confidentiality of the procedure.

Article 19

Persons in managerial positions (editor-in-chief, editors, shift supervisors, producers) have an increased responsibility to prevent unwanted conduct and to react immediately if such conduct occurs.

Failure of a person in a managerial position to act in accordance with paragraph 1 of this Article shall constitute a breach of work duty.

Article 20

The employer undertakes to organize training for employees on the application of this Rulebook at least once a year.

Persons in managerial positions with the employer are obliged to attend training on the application of this Rulebook.

REPORTING HARASSMENT

Commissioner for Protection against Harassment at Work

Article 21

The employer appoints two Commissioners for protection against harassment at work (hereinafter: the Commissioner) for a term of two to four years, with the possibility of reappointment, and ensures their functional independence.

A Commissioner may be a person who enjoys professional integrity and the trust of employees, has developed communication skills, understands the newsroom working environment, and has basic knowledge in the field of labour law, protection against harassment, and gender-based violence.

Procedure for the Selection of the Commissioner

Article 22

Any employee who meets the conditions set out in Article 21 paragraph 2 of this Rulebook may apply for the position of Commissioner, following a public call announced by the employer.

Commissioners are appointed by the employer based on the highest number of votes received from employees.

Functional Independence

Article 23

The Commissioner shall be independent and autonomous in their work and may not receive instructions, orders, or be subjected to pressure in relation to handling complaints.

The employer is obliged to ensure conditions for the independent work of the Commissioner, including:

1. access to all relevant information and documentation;
2. the possibility of direct communication with employees;
3. technical and administrative support;
4. time to perform duties within working hours.

Conflict of Interest

Article 24

The Commissioner may not act in a case in which they are personally involved or affected, where there is a relationship of subordination or supervision with the reported person, or where other circumstances raise doubts about their impartiality.

In the cases referred to in paragraph 1 of this Article, the case shall be assigned to another Commissioner or, if that is not possible, directly to the second-instance Commission.

Submission of Complaint

Article 25

A complaint shall be submitted to the Commissioner chosen by the affected person through:

- a) a dedicated email address;
- b) telephone;
- c) in person;
- d) by post in a sealed envelope marked “Confidential – for the Commissioner”.

The employer is obliged to ensure that all reporting channels are anonymous.

Content of the Complaint

Article 26

The affected person may submit a complaint with or without disclosing their identity to the employer and the Commissioner, but the complaint must include: the identity of the reported person (name and surname and function/position and circumstances enabling clear identification), a description of the event, time and place, and available evidence.

The Commissioner is obliged to protect the identity of the affected person and the identity of the reported person in accordance with the circumstances of the case.

Actions of the Commissioner

Article 27

The Commissioner shall confirm receipt of the complaint immediately, and no later than within 2 working days.

The Commissioner shall conduct a preliminary risk assessment within 5 working days, with the possibility of adopting interim measures on the same day for high-risk incidents.

The preliminary risk assessment evaluates the immediate risk to the safety and health of the affected person, as well as the possibility of recurrence or escalation of prohibited conduct.

The purpose of the assessment is risk management and ensuring protection and support for the affected person.

The Commissioner conducts the risk assessment by asking key questions to determine whether there has been repeated conduct, whether it involved violence or threats of physical harm, whether weapons were involved, and whether the affected person feels unsafe, threatened or distressed.

Interim Measures

Article 28

If, during the risk assessment, the Commissioner determines that there is an immediate risk to the safety and health of the affected person, the Commissioner shall propose interim measures to the employer to eliminate the risk, without prejudging the outcome of the procedure, such as:

- a) temporary prohibition of direct contact;
- b) change of shift, workplace or work regime of the reported person;
- c) temporary suspension of the reported person in accordance with applicable acts and law;
- d) provision of escort during fieldwork;
- e) coordination with platforms to remove doxing and threats;
- f) other measures depending on the circumstances.

The employer shall decide on interim measures immediately, and no later than within 48 hours from the proposal.

Interim measures may last until the conclusion of the procedure.

Powers of the Commissioner in the Fact-Finding Procedure

Article 29

In the fact-finding procedure, the Commissioner shall undertake all actions necessary to establish relevant facts and circumstances, while respecting confidentiality, dignity, and the prohibition of secondary victimization.

The Commissioner may in particular:

- conduct an interview with the affected person while preserving anonymity;
- summon and hear the reported person;
- interview witnesses and other relevant persons;
- request and examine documentation, electronic communication, internal records, recordings and other available evidence;
- record and store collected evidence;
- establish facts even when the reported person is a third party and propose protective measures.

The procedure before the Commissioner should be completed within 30 days from initiation.

Article 30

Based on the collected data and established facts, the Commissioner shall issue a reasoned opinion containing:

- a description of the complaint;
- actions taken;
- established facts;
- assessment of whether harassment occurred;
- proposed measures to eliminate consequences and prevent further harassment;
- proposal to initiate disciplinary or other procedures;
- instruction on the possibility of initiating a second-instance procedure before the Commission.

If there are grounds, the Commissioner shall refer the affected person to seek protection through judicial or other proceedings, including reporting a criminal offence with the consent of the affected person.

SECOND-INSTANCE PROCEDURE

Commission for the Prevention of Harassment

Article 31

The Commission for the Prevention of Harassment (hereinafter: the Commission) is a second-instance body.

The Commission shall consist of:

- a) a legal professional employed by the employer;
- b) a representative of the human resources department;
- c) a Commissioner who did not act in the first instance.

The Commission shall elect a chairperson from among its members.

In cases referred to in Article 24 of this Rulebook, instead of the Commissioner, a person responsible for occupational safety and health shall act as a member of the Commission.

Article 32

The second-instance procedure shall be initiated, within three days from the receipt of the Commissioner's opinion, by a request of the affected person or the reported person for the Commission to review the case following the Commissioner's actions.

Article 33

A member of the Commission shall be excluded from a case in which they are personally involved or affected, where there is a relationship of subordination or supervision with the reported person, or where other circumstances raise doubts about their impartiality.

In the case of exclusion of a member of the Commission, the employer shall appoint their replacement.

Actions of the Commission

Article 34

The Commission shall be authorized to:

- determine whether the procedure before the Commissioner was conducted impartially, without conflict of interest, and with respect for the rights of participants;
- assess whether the relevant facts have been fully and properly established;
- verify whether all available and relevant evidence has been examined;
- assess the credibility and logical consistency of the Commissioner's opinion;
- assess whether the form of harassment has been correctly classified;
- assess whether the proposed measures are adequate, proportionate, and effective;
- assess whether additional or different protective measures are necessary;
- exceptionally supplement the procedure where significant deficiencies are identified, and obtain additional information or statements only to the extent necessary to remedy such deficiencies;
- confirm the Commissioner's opinion;
- amend the opinion (establishing differently the existence or absence of harassment);
- propose specific measures to the employer (disciplinary, organizational, protective).

Article 35

The procedure before the Commission shall be completed within 30 days from the initiation of the second-instance procedure.

In complex cases, the deadline may be extended by an additional 30 days, with a reasoned decision of the Commission.

SANCTIONS

Article 36

Sanctions shall be imposed in accordance with the Labour Law, the Employer's Rulebook on Work, and employment contracts.

With respect to third parties, the employer may undertake the following measures: termination of cooperation, prohibition of access to premises, prohibition of contact with the affected person, reporting to competent authorities and platforms with the consent of the affected person, as well as other measures deemed appropriate in the circumstances.

Article 37

In addition to sanctions, less severe measures may be imposed where the same purpose can be achieved, including: apology, mandatory training on prevention and protection against harassment, change in work organization.

SUPPORT TO THE AFFECTED PERSON AND PROTECTIVE MEASURES

Article 38

Support shall be provided to the affected person regardless of the outcome of the procedure where there are grounds to suspect that a harmful event has occurred.

Support may include: medical examination, psychological counselling, legal support (internal or external), security assessment, temporary relocation or change of engagement, and assistance in digital security.

Article 39

Any form of retaliation against the affected person who reported harassment, witnesses, Commissioners, and members of the Commission is strictly prohibited.

Any form of retaliation shall constitute a serious breach of work discipline.

DATA PROTECTION, RECORDS AND EVIDENCE RETENTION

Article 40

Data collected in the procedure shall be considered particularly sensitive under internal classification and shall be processed with security measures, restricted access, and access logs.

Access to the collected data shall be granted only to: Commissioners, members of the Commission, authorized persons implementing measures, and, where necessary, external experts subject to confidentiality obligations.

Article 41

Case files shall be retained for at least five years from the conclusion of the procedure, or longer if judicial or inspection proceedings are ongoing, with periodic review of the need for retention.

MONITORING AND EVALUATION

Article 42

The Commissioners and the Commission shall prepare a joint annual anonymized report containing: the number of complaints, types of incidents, timelines of procedures, measures taken, and recommendations.

The employer shall inform employees about the report referred to in paragraph 1 of this Article.

FINAL PROVISIONS

Article 43

This Rulebook shall enter into force on the eighth day following its publication on the notice board and/or the employer's website and shall apply to all new and existing employees, subject to signing a statement of acknowledgment.

About The Project

The project “Ending workplace harassment in the media industry in Slovenia, Croatia, Serbia and Bosnia and Herzegovina - Women in the Media” directly aligns with the European Commission's 2020 – 2025 Gender Equality Strategy, which emphasizes the need for freedom from violence and stereotypes. It specifically addresses the call CERV-2024-DAPHNE, which seeks to prevent and combat gender-based violence. By focusing on the media sector, the project tackles a crucial area where such violence is present.

The project is being implemented by five partners: Zavod Krog (Slovenia), the Trade Union of Croatian Journalists, (Croatia), the Trade Union of Culture, Art and Media "Nezavisnost" (Serbia), Mediacentar Sarajevo (BiH) and Slovene Association of Journalists (Slovenia), co-funded by the European Union.

The project is supported by the University of Novi Sad, Faculty of Philosophy – Department of Media Studies, the Ministry of Labour, Family, Social Affairs and Equal Opportunities of Republic of Slovenia, Research Centre of the Slovenian Academy of Sciences and Arts, Republic Agency for Peaceful Settlement of Labour Disputes from Serbia, and Faculty of Social Sciences – University of Ljubljana.

The project is designed to combat sexual harassment in the media specifically targeting the public broadcasting services across Slovenia, Croatia, Serbia, and Bosnia and Herzegovina. It includes analytical activities, such as cross-national comparative research, development of transferable Rule book (setting standards), identification and exchange of good practices among partner countries, trans-national cooperation of journalists and experts, awareness raising, advocacy and capacity building activities that involve journalism students, male and female journalists and media management.

The project promotes a culture of respect, diversity, and inclusion, critical to achieving long-term gender equality in the media sector in in Slovenia, Croatia, Serbia and Bosnia and Herzegovina, including EU and non-EU member states.



About The Partners

- Zavod Krog (Slovenia):

international, non-governmental & non-profit organization that works in the field of human rights protection, humanitarian work, social equality, development cooperation, environmental protection and other forms of inequality, and social exclusion. Zavod Krog is managing the project, leveraging its experience in handling regional projects to ensure effective implementation across different countries.

- Trade Union of Croatian Journalists (Croatia):

has been established in 1996 and since then is a pivotal organization in advocating for the rights and welfare of journalists in Croatia. Trade union members are active in combating for better working conditions of women journalists. They will be in charge of coordinating the overall/joint awareness raising activities and closely cooperate with each partner in the process, providing them the mentorship needed.

- Trade Union of Culture, Art and Media "Nezavisnost" (Serbia):

is a union that aim for protecting the economic, social, educational, professional and cultural interests of its members and employees in the activities it covers. It has a Women's section which regularly deals with these kinds of incidents. They are coordinating the development of the Rulebook, ensuring it aligns with existing legal framework and follow EU standards in the field.

- Mediacentar Sarajevo (BiH):

is an organization dedicated to improving journalism standards and working environment of journalists, protecting and promoting media freedom in BiH and the Western Balkans region. They developed the research methodology for the cross-border comparative research and managed the overall research process.

- Slovene Association of Journalists (Slovenia):

was founded in 1905. It has around 800 members and is also a full member of the European Federation of Journalists (EFJ) and the International Federation of Journalists (IFJ). The Association has been conducting journalist trainings in various forms and on various platforms for several decades. Therefore, for the capacity building activities they can provide experienced organisers, and most importantly, access to their membership base, which counts nearly 800 members from national, regional, and local media outlets. The Slovene Association of Journalists will lead the development of the training curriculum.





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