Policy and Guidelines for Dealing with Cases concerning Harassment, Sexual Harassment or Offensive Treatment
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1. **Policy**

_The Stockholm University of Art is to be known for its respect for each other’s differences and opinions. Both the study environment and the working environment must feel welcoming and inclusive. Students and employees are to be treated equally and in a respectful manner. Together, we will safeguard our good study and working environment. No discrimination, general harassment/sexual harassment nor offensive treatment may be allowed to take place._

2. **Introduction and definitions**

This document covers only those parts of the Swedish Discrimination Act where SKH has an investigative obligation: discrimination in the form of harassment or sexual harassment, or offensive treatment/behaviour.

Offensive treatment or an act of disadvantaging someone which is not related to any of the enumerated grounds of prohibited discrimination is not encompassed within the Swedish Discrimination Act but on the other hand such matters are included in the Swedish Work Environment Authority’s Regulations on the organisational and social aspects of the working environment (AFS 2015:4). This Regulation does not encompass students. Nevertheless, SKH has chosen to deal with offensive treatment/discrimination directed at a student in the same manner as if it was directed at a faculty/staff member.

The meaning of “discrimination” is defined in the Swedish Discrimination Act (SFS 2008:567).

A simplified description of discrimination, according to the Swedish Discrimination Act, is that someone’s personal integrity is violated or that they are treated disfavourably compared to someone in a comparable situation. The disadvantaging or offensive treatment must have in some manner a connection to one of the seven enumerated grounds of prohibited discrimination in order for it to be considered discrimination under the Swedish Discrimination Act.

- Gender
- Transgender identity or expression
- Ethnicity
- Religion or other belief
- Disability
- Sexual orientation
- Age

Harassment and offensive treatment should not be confused with temporary conflicts, disagreements or problems in collaborative relationships that can occur in working and study environments. Complaints concerning students who do not result in harassment or offensive treatment refer to SKH’s complaint handling routine. More information can be found under the student section of SKH’s intranet.
2.1 The difference between discrimination and harassment

The difference in the definition of discrimination or harassment is the assessment of who is carrying out the act. If an individual who represents SKH subjects a student to such behaviour, it is regarded as discrimination according to the statute. The same applies if an individual in a supervisory position or managerial role subjects another employee to such behaviour. On the other hand, an employee who is neither an individual in a supervisory position nor in a managerial role and who subjects another employee to behaviour that violates his/her personal integrity and dignity, and whose actions are related to any of the enumerated grounds of prohibited discrimination, has committed an act of harassment. In this case, SKH is therefore not guilty of discrimination on the basis of the individual employee’s actions or behaviour. It is however SKH’s responsibility to investigate the facts and circumstances of the reported harassment and, where appropriate, to take the remedial measures that may reasonably be required to prevent harassment in the future. The same applies if a student subjects another student to harassment. Therefore SKH is not guilty of discrimination in this case either, but nevertheless it must investigate the matter expeditiously and take any relevant remedial measures.

As an employer and a provider of higher education, SKH has a particular defined responsibility as it concerns discrimination in the form of general harassment and sexual harassment, and these administrative procedures concern primarily how these forms of discrimination and offensive treatment are to be dealt with.

2.2 Definitions of terms

2.2.1 Harassment and sexual harassment

**Harassment** is conduct or an act that violates someone’s dignity or personal integrity. In order to be encompassed within the Swedish Discrimination Act, the offending conduct must be related to one or more of the enumerated grounds of discrimination as outlined above.

Harassment may be, for instance, the expression of ridicule or disparaging generalisations, with a connection to the grounds of prohibited discrimination.

Harassment may also be of a sexual nature. In such chase, it is then referred to as **sexual harassment**. In addition to making comments and words spoken, it may be that someone teases another suggestively gropes or paws at them, or throws a look at them in an inappropriate manner, to mention some illustrative examples. Or it may concern unwelcome compliments, invitations, or hints and suggestive comments.

Harassment and sexual harassment is behaviour towards another person is unwanted. It is the person subjected to the harassment who determines whether the act or behaviour is unwanted or offensive, and it will vary from person to person what can be perceived as offensive. In general, there is no requirement for intent for an act to be assessed as discrimination or offensive treatment; it is the consequence of the conduct and how the

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1 Under the Swedish Discrimination Act, “managerial role” means an individual who has managerial and operational responsibilities, an individual who has the right to make decisions on behalf of the employer.
person subjected to the discrimination or offensive treatment experiences it that is
determinative. However, the person subjected to the behaviour should make it clear to the
person who has harassed or treated them offensively that the behaviour has been
perceived as offensive and unwelcome. If the offensive treatment has been so serious, or
it has been clear and obvious that the conduct is unwelcome, there is no obligation to
provide information in advance as a precondition of taking action, imposing sanctions or
to issue any disciplinary measures.

2.2.2 Offensive treatment

Offensive treatment is unpleasant behaviour or acts of a negative character that are
directed against one or more faculty/staff member(s) or student(s) in an abusive or
offensive manner that risks leading to ill health or that the person being subjected to this
behaviour is placed outside the community in their work environment or study group.
These acts include, for example, invisibility, ostracism, defamation, withholding
information, bullying, psychological violence, insults, unjustified removal of job
responsibilities, or sabotage of work or study. It does not need to have a connection with
any of the enumerated prohibited grounds of discrimination for it to be regarded as
constituting offensive treatment. It is the person being subjected to the behaviour who
determines whether the behaviour or actions are perceived as unwanted and leads to
discomfort. In order to be considered offensive, the person engaging in the offending
acts/conduct must have been made aware that the conduct is offensive. Sometimes
however it can be obvious that the offending person should have realised that they have
committed an act of wrongdoing (offensive treatment). In such cases, no specific special
remarks are needed from the person who feels subjected to the unwanted behaviour.

3. Proactive measures and prevention

3.1 Preventive efforts

All employees and students have a responsibility to contribute to a good working and
study environment. SKH also needs to work systematically to prevent all forms of
discrimination, harassment, and offensive treatment. These efforts are partly a part of the
systematic management of the work environment and partly governed by the Swedish
Discrimination Act. SKH is legally obligated to take measures to prevent and prevent any
employee or student from being subjected to offensive treatment, harassment/sexual
harassment or retaliation because they have filed a complaint.

According to the Swedish Discrimination Act, SKH, as an employer and provider of
higher education, must make efforts with proactive measures that prevent and combat
discrimination. This includes working for equal rights and opportunities irrespective of
gender, gender identity or expression, ethnicity, religion or other belief,
disability/functional variation, sexual orientation and age.

SKH’s proactive measures and preventive work are described in the SKH Plan for
Proactive Measures: Equal Terms, Equal Value, which is updated annually.
Activities to promote a good working and study environment are also included in SKH’s work environment plan. Information about SKH’s efforts in the systematic management of the work environment is described on the intranet under the Personnel Handbook.

4. **Division of responsibilities, delegation, and retaliation**

4.1 **Distribution of responsibilities**

The employer/higher education provider always has the ultimate primary responsibility for the work/study environment, which means among other things, that the overall responsibility is placed on the Vice-Chancellor and all individuals in a supervisory position at SKH have the responsibility for preventing, paying attention to and dealing with any offensive treatment or harassment that may arise within their respective Department (administrative department).

The responsibility for personnel, the working environment and safety has been delegated to managers with responsibilities vis-à-vis personnel via the Vice-Chancellor’s and the Director of Administration’s delegation of responsibilities and authority to individuals in supervisory positions, Line Managers. The responsibility for the work and study environment and safety within the Department for those employed by the University (including PhD candidates) and students has been delegated to the Heads of the Departments. (SKH 2020/636/1.2.3 and SKH 2019/1042/1.2.4, respectively).

The individuals in a supervisory position at SKH thus have the responsibility to take measures with the goal of preventing harassment/sexual harassment or offensive treatment, and ensuring that there are working methods for how this should be administratively dealt with at the Departments, based on SKH’s common procedures. Working together, all faculty/staff and students collectively have a shared responsibility to contribute to a respectful, inclusive, and good working environment.

If an individual in a supervisory position at SKH learns that a person employed by the University (also encompasses PhD candidates) or a student has been subjected to harassment/sexual harassment or offensive treatment, the person holding a supervisory position has the responsibility to act immediately. It is always the individual who is in a supervisory position over the person subjected to the behaviour who has the responsibility to ensure the matter is looked into, including an investigation is conducted if warranted. The immediate supervisor of the accused person, or the Head of the Department if the accused is a student, is to also be informed of the incident. If the person subjected to the behaviour is working at/enrolled at a different Department the individual with a supervisory position who has become aware of the incident is obligated to inform the Line Manager or Head of Department of the person subjected to the behaviour.

4.2 **Retaliation**

An individual in a supervisory position may not subject an employee to retaliation, and a Head of Department (nor any teachers) may not subject the student to retaliation because
the individual has reported or called attention to discrimination or harassment, participated in or assisted with an investigation, or rejected harassment or other unwelcome behaviour. The ban on retaliation has the objective to protect employees and students who complain about or call attention to discrimination or harassment.

Retaliation is when an individual in a supervisory position or teacher engages in actions that have the character of punishment or revenge. This for example may be actions, statements or omissions that may cause harm or discomfort to an individual. Examples of this include deteriorated working conditions/situation, unreasonable workload, being deprived of job responsibilities, being given a lower grade in a class, etc.

5. **Obligation to investigate and take remedial measures**

SKH has an obligation to ensure that no harassment occurs in its workplace or in the context of its educational programmes. If an employer or provider of education becomes aware that there has been harassment, sexual harassment or offensive treatment, the statute requires an investigation obligation to find out what has happened, to put an end to the behaviour and, where appropriate, to take the remedial measures that may reasonably be required to prevent harassment in the future. No formal report/complaint is required for the obligation to investigate to arise. The obligation to investigate allegations of harassment or sexual harassment is set out in Chapter 2, Section 3 and Chapter 2, Section 7 of the Swedish Discrimination Act. Administrative management for offensive treatment can be found in AFS 2015:4.

5.1 **If a student is subjected to such behaviour**

If a faculty/staff member at SKH learns that a student who participates in or has applied to SKH’s activities holds the opinion that they have been subjected to harassment or offensive treatment, the student’s Head of Department must be informed and the facts and circumstances investigated.

If a student feels they have been subjected to unwanted behaviour, the student should themselves contact the Head of their Department. If the situation is such where it is the Head of Department who has subjected the student to any unwanted behaviour, the student can contact the student ombudsman.

5.2 **If a faculty or staff member is the person being subjected to such behaviour**

If a faculty or staff member becomes aware that an employee considers that he or she has been harassed or subjected to offensive treatment by another employee, SKH is obligated

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2 The term “employer” encompasses not only individuals in a supervisory position with responsibilities for personnel, but also other employees who formally represent the employer in the course of their employment. This includes, for example, the HR Department and employees who do not have their own managerial
to investigate the facts and circumstances in the matter. A person who is doing an internship or is an hourly employee at SKH is to be, in this regard, treated the same as a regular employee.

If an employee feels they have been subjected to such behaviour, the employee should contact the individual in a supervisory position vis-à-vis them. If it concerns an individual in a supervisory position who has subjected the employee to unwanted behaviour, the employee can turn to the HR Department.

5.3 General information about situations that have arisen

The starting point is that situations experienced should be dealt with as close as possible to the person concerned, by the individual in the closest supervisory position to the person (if an employee), or for a student, the Head of their Department.

SKH constantly takes efforts to ensure a well-functioning and good study environment and work environment. If SKH has done what SKH has been able to do to investigate the incidents but has come to the conclusion that no harassment has occurred, SKH is not obligated to do anything more.

In the event of an act or behaviour by someone who is not of a serious nature or something that can be avoided by direct on-the-spot notice, it may be sufficient for the person to be made aware that the behaviour is inappropriate. Therefore this does not necessarily need to lead to the opening of a formal investigation. However, this is a matter of judgment for the individual in a senior supervisory position, which sometimes can be difficult to determine. See below under “Looking into the matter.” If any uncertainties arise, the individual in a senior supervisory position should consult the Vice-Chancellor/Director of Administration.

6. Administrative procedures, with, looking into the matter and an investigation in the event of suspicion of harassment, sexual harassment or offensive treatment

When SKH becomes aware that offensive treatment or harassment may have taken place, the incident must be looked into and the facts and circumstances investigated. This applies irrespective of whether it is a student or employee who is reported to be the person who committed the harassment.

It is very important to act promptly immediately after any incident comes to SKH’s attention. Even information that comes in anonymously must be looked into. But responsibilities but who have been appointed by the Vice-Chancellor as a member of SKH’s senior Leadership.
information received anonymously may not be the sole basis for disciplinary action. However on the other hand, such information even if submitted anonymously may serve as a basis for taking general preventive measures.

In the first instance, the matter is to be dealt with by the individual in a supervisory position vis-à-vis the person subjected to the behaviour or the Head of Department. The investigation of the case is to be carried out in an objective, objective, and legally sound manner. The investigative work is to be carried out as a matter of urgency and with great discretion and documented. The purpose of investigating something is to obtain sufficient information about the situation and to assess what measures should be implemented to bring the offensive treatment/harassment to an end and prevent a repetition where it occurs again.

The investigative work requires the voluntary participation of the persons concerned, SKH does not have any coercive measures for the conduct of the investigation. The work from the time of becoming aware of the situation to launching an investigation can be divided into three different parts. The three parts are: looking into the matter, a local investigation, and if there are grounds to do so, a University-wide investigation. The three different parts are described below.

6.1 Looking into the matter

A student/employee/manager/course coordinator (etc.) becomes aware that an employee or a student feels that they are being subjected to offensive treatment (see above in sections 5.1 and 5.2). Anyone who has become aware of the situation should pass the information on to the individual in the closest supervisory position/Head of Department. In most cases, the dealing with the matter in the form of conversations may be sufficient to resolve the situation without any further intervention. The Vice-Chancellor is always to be informed of the situation.

In case of uncertainty about how the case should be dealt with administratively, contact the HR Department and/or an equality and diversity officer initially.

Employees/students have the possibility to have a support person with them, such as a union representative/student ombudsman, at any meetings. If necessary, measures are to be taken to appropriately deal with the situation. Any measures taken may also need to be monitored and followed up in order to ensure that they have had the desired effect. The individual in the closest supervisory position to the affected person documents the case in the registry.

Even if no offensive treatment/harassment has actually occurred but a student/employee has experienced a particular situation as such, an official note of this finding is to be placed in the registry.

Often the case can be closed after the matter has been looked into and appropriate measures taken. However in some cases there may be a need for a more formal investigation with a formal decision. This is described in great detail under the sections below.
6.2 Local investigation

If the incident is of a serious nature and the individual in a supervisory position vis-à-vis the person subjected to the behaviour is of the opinion considers that how the matter was dealt within the initial investigatory phase is not sufficient and that a more extensive formal investigation is necessary, a local investigation can be initiated. Such administrative management may consist of, for instance, questions being asked of any other persons involved. It may also be necessary to ask persons other than those directly involved for a description of the actual situation. Against the background of the findings of the local investigation, additional measures may be taken, which are to also be followed up on. If an individual in a supervisory position is of the opinion that this concerns serious incidents of offensive treatment or if they are unsure how the case should be dealt with administratively, they should contact the HR Department and/or an equality and diversity officer. The individual in the closest supervisory position, or the person that individual designates, is to document the case and enter the decisions taken in the registry. The individual in a senior supervisory position decides on any further investigation and/or measures for the matter. The Vice-Chancellor must always be informed of ongoing investigations.

6.3 University-wide investigation

If evidence emerges of harassment, sexual harassment or more serious offensive treatment and/or that the measures in the initial investigatory phase/local investigation were not sufficient, a formal and more thorough, centralised University-wide investigation may be necessary. This may also apply if the situation involves persons from different Departments. Support in assessing the nature of the case and further investigation can be provided by the HR Department or an equality and diversity officer. The Vice-Chancellor decides who will investigate the matter, such as the HR Department or an equality and diversity officer, a consultant external to SKH, or the occupational healthcare service commissioned by SKH. A University-wide investigation is formally closed by the Vice-Chancellor in the form of a decision entered into the registry. The Vice-Chancellor also decides whether the matter should be taken to the Personnel Disciplinary Board (employees) or the Student Disciplinary Board (students).

6.4 General guidance

To you as the individual in a senior supervisory position:

- Do not minimise or be dismissive of what the employee/student has experienced. Informing others about harassment, including sexual harassment, means that the employee/student is placed in a very vulnerable position. Irrespective of whether it is general harassment or sexual harassment, it is to be investigated pursuant to the Swedish Discrimination Act. The same applies to offensive treatment.
- Even if after the matter has been looked into or investigated, and it has not been proven that offensive treatment has occurred, there may nevertheless be a workplace or study environment problem that may still needs to be addressed.
- Avoid the spreading of rumours by not speaking about what occurred with persons who are not involved.
- It may sometimes be appropriate that there is a designated contact person who has overall responsibility and manages the contacts with the parties involved. This is true primarily in the more formal investigations (local/University-wide investigation). Examples of possible contact persons are SKH’s student ombudsman, any employee at the HR Department or an equality and diversity officer. The individual in a supervisory position has the responsibility to ensure that someone returns to the parties involved with information about who will conduct the investigative work and who they may, if necessary, turn to.
- The involved parties should be heard as soon as feasible.
- If the employee/student subjected to the behaviour in question does not desire to cooperate with the person looking into the matter or participate in an investigation, it can be difficult to make an assessment in the case and the possibility of taking action will therefore be limited. The employee/student should be informed of this. It may also lead to that any corrective measures decided on need to be located at a generalised level, including the corrective measures that may be necessary to take in order prevent continued harassment. It is also important to pay special attention to that the investigative work does not further subject the complaining person to further abuse or negative treatment. However, SKH cannot choose to stop an investigation on its own initiative; this is due to that employers generally have a statutory duty to investigate.
- The investigative work must be characterised by respect for all involved and, at least initially, by a neutral approach to both parties.
- In some cases, it may be appropriate to take certain (possibly temporary) measures even before the case is clarified, such as making changes to the student’s schedule, if a teacher is accused by a student of engaging in unwanted behaviour.
- The person whom a complaint has been filed against should also be given the opportunity to explain themselves, partly to be given the opportunity to cease the harassment and partly because it may turn out that it is in fact not a matter of harassment or other inappropriate behaviour, but rather for instance, problems with working together or other conflict. Therefore it is important to consult with and listen to the parties involved before any measures are taken. By having a discussion with the person who has been “reported” for harassment/sexual harassment or offensive treatment, the head/Head of Department or other representative of the University also indicates that SKH takes incidents of this nature seriously.
- If the incident has been carried out by an employee and is of a criminal nature that is likely to result in a sanction other than a monetary fine, SKH is obligated to file a report with the police (as set out in Section 22 of the Swedish Public Employment Act (1994:260)).
- If a student or an employee desires to file a police report, SKH can provide support and assist with the report.
- Cases of this nature should be dealt with discretion and promptly. Ensure that those involved receive information about the processing of the case as it proceeds, if they have a need for this.
- Provide information about the Occupational Healthcare Services or alternatively the Stockholm Student Health Services – Studenthälsan and recommend that they contact them for call support or for tips on other forms of support. The person whom a complaint has been filed against reported also has the right to contact the Occupational Healthcare Services (employee)/Stockholm Student Health Services (student) for support. Students can also contact the student ombudsman for support.
- Urge both parties to maintain a diary/journal and to save any letters, e-mails, text messages or anything else that may be relevant.

6.5 Looking into the matter/The investigative work – directed at those who conduct an investigation

- The person with supervisory authority over the person subjected to the behaviour has the responsibility to ensure the matter is looked into and a local investigation is conducted when relevant. If the persons involved are from different Departments, a University-wide investigation may be appropriate. In such a situation, the Vice-Chancellor has overall responsibility.
- If necessary, a contact person/administrative support for the work can be designated. This is proposed in such a case by the individual in a senior supervisory position, taking into account the wishes of the parties involved.
- The individual holding a supervisory position is to always inform the Vice-Chancellor of the situation.
- If the person who is being accused is in a supervisory position, the responsibility shall instead fall to the superior manager to look into the matter or local/University-wide investigation (if such is established).
- If a neutral external party is needed, a consultant from the Occupational Healthcare Services or another body can be engaged to conduct the investigation and then the investigation is called a University-wide investigation. In these cases, the Vice-Chancellor is to decide whether a University-wide investigation is to be conducted.

6.6 Investigation procedure (local/University-wide investigation)

- Set up a time and have a discussion with the “complainant,” the individual subjected to the behaviour, in order to attempt to find out what has occurred.
- Set up a time for and have a discussion with the “accused party,” the person whom a complaint has been filed against, to enable them to give their version of what has taken place.
- Set up a time for and have a conversation with other individuals who may have been present and who may have knowledge of what has occurred, if this is necessary.
- Be clear in informing everyone that what is said will be documented in writing.
- Provide information about the Occupational Healthcare Services /Stockholm Student Health Services – Studenhäl san (see above).
- If the individual in a supervisory position deems it appropriate, the person being interviewed may be given the opportunity to read the memorandums and present their views on the situation. The memorandums will then become a public document and must be entered into the registry concerning the matter.
- The person who has the responsibility for the investigation must make an assessment of what has occurred.
- The investigation is to then result in a documented position on the matter/decision stating what measures need to be taken to put an end to the unwanted behaviour and prevent something similar from occurring again.
- If it is a local investigation, the individual in a supervisory position makes a decision or takes position on the matter. If the investigation is University-wide, the decision is made by the Vice-Chancellor.
- With a formal investigation, the decision is to be communicated to the parties involved.
- Contact the registrar to obtain a case number; and so this will be indicated in the official register, state that the case is an investigation pursuant to the Swedish Discrimination Act and may contain sensitive personal information.
- If a third party requests documents in the case, a confidentiality assessment is to be made. In the event an unrelated third-party requests copies of documents in the case, a confidentiality assessment is to be made. For institutions of higher education the permitted public access to information is only selectively restricted and there are only a few confidentiality rules and provisions applicable to the activities of institutions of higher education. Many times only the generally applicable confidentiality provisions in Chapter 21, Section 1 of the Swedish Public Access to Information and Secrecy Act (SFS 2009:400) are relevant. The possibility of de-identification/data anonymisation is stated in the section of the Act, if the nature of the information is intrusive or relates to a violation of personal integrity.

6.7 Closure and following-up
- If the after looking into the matter or after an investigation, it has been shown that no harassment, sexual harassment, or offensive treatment has occurred according to the provisions in the statute/regulation, SKH has no obligation to take any action. However in some cases it may be a problem with the working relationship or a conflict, which may need to be addressed and remedied in order to achieve a good study and work environment.
- If the investigation shows that harassment, sexual harassment or offensive treatment within the meaning of the statute/regulation has occurred, corrective measures must be taken in order to ensure that the harassment/offensive treatment ceases.
- If the investigation shows, on the basis of the information available, that it is not possible to conclude that harassment, sexual harassment or offensive treatment has occurred, but rather that other types of inappropriate behaviour have occurred
or other problems have arisen, corrective measures are to be taken at a general level.

- There is no possibility of appeal in a decision in these cases, however if any of the parties holds the opinion that SKH has failed in its obligation to investigate, they can contact the office of the Equality Ombudsman (DO).
- The follow-up of the matter is to also be planned and implemented in such a manner so as to ensure that the harassment/offensive treatment has ceased.

6.8 Post-investigation corrective measures

- If it has been established that harassment, sexual harassment or offensive treatment has occurred, corrective measures to stop this and prevent a repetition must be introduced immediately. In both the short term and the long term, the purpose of the corrective measures implemented is that the harassment/offensive treatment ceases and is not repeated. What actions/corrective measures are appropriate in a specific case depends upon what the results from the investigation have shown in that particular case.

- If the matter concerns incidents of especially serious harassment, sexual harassment or offensive treatment, and/or that the study environment or working environment is unsafe or feels insecure due to what has occurred, disciplinary action may need to be considered. This is then dealt with administratively by SKH’s Personnel Disciplinary Board (PAN). It is the Vice-Chancellor who decides whether a case is to be raised in the Personnel Disciplinary Board (Section 25 of the Swedish Public Authority Regulation (2007:515))

- If it concerns a student subjecting another person to harassment/sexual harassment, the Vice-Chancellor may decide that the matter is to taken up by SKH’s Student Disciplinary Board. Possible sanctions imposed may be imposed, for example suspension from studies (see Chapter 10 of the Swedish Higher Education Ordinance (1993:100)).

- It is important to make the person/persons who harass aware that the behaviour is perceived as harassment, sexual harassment or offensive treatment and that the behaviour must immediately cease. Employees are to also be made aware that a repetition may result in disciplinary action which, in serious cases, may lead to termination of employment, and students are to be made aware that they are at risk of disciplinary measures in the form of a warning or suspension.

- Repeated regular follow-ups with the accused party and the individual subjected to the abuse, as well as with others affected by the incident(s). Pay increased attention, especially at locations and at times that has been shown to be associated with such risks.

- If it concerns a faculty or staff member, conduct a discussion about misconduct, or if it concerns students conduct a discussion about the potential impact on the study environment.