Protocol for the Prevention of and Action Against Sexual Harassment, Harassment Based on Sex, and Other Behaviors Contrary to Sexual Freedom and Moral Integrity in the Workplace of the Caminando Fronteras Collective

CAMINANDO FRONTERAS

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1 Commitment of the Caminando Fronteras Collective Association to the management, prevention, and eradication of sexual harassment, harassment based on sex, and other behaviors contrary to sexual freedom and moral integrity in the workplace.

With this protocol, the Caminando Fronteras Collective expresses its zero tolerance for the occurrence of behaviors constituting sexual harassment, harassment based on sex, or behaviors contrary to sexual freedom and moral integrity throughout its organization.

By adopting this protocol, Caminando Fronteras Collective seeks to underline its commitment to the prevention of and response to such behaviors, informing all personnel providing services within the organization of its application, whether they are direct staff or come from other associations, including individuals who, without having an employment relationship, provide services or collaborate with the organization, such as trainees, those undertaking non-employment internships, or volunteers.

Furthermore, Caminando Fronteras Collective undertakes to make the existence of this protocol known, indicating the need for strict compliance, to those associations to which it sends its own personnel, as well as to the associations from which personnel working at Caminando Fronteras Collective originate. Thus, the obligation to observe the provisions of this protocol will be included in contracts signed with other associations.

When the alleged harasser is outside the authority of the association and, therefore, Caminando Fronteras Collective cannot fully apply the procedure, it will address the competent association so that it may resolve the issue and, if necessary, sanction the responsible person, warning that if it does not do so, the business relationship between both associations may be terminated.

The protocol will apply to situations of sexual harassment, harassment based on sex, and other behaviors contrary to sexual freedom and moral integrity that occur during work, in connection with work, or as a result of work:

a) at the workplace, including public and private spaces when they are a place of work;

b) in places where the worker is paid, takes a rest break, or eats, or where they use sanitary or washing facilities and in changing rooms;

c) during work-related travel, trips, events, or social or training activities;

NOTE: Protocol reviewed and approved by the General Assembly of Members of Caminando Fronteras on June 18, 2025.

d) in the context of communications related to work, including those carried out through information and communication technologies (digital, virtual, or cyber harassment);

e) in accommodation provided by the employer;

f) in the journeys between home and the workplace.

This protocol is implemented in accordance with the European Framework Agreement on Harassment and Violence at Work and complies with the requirements of ILO Convention No. 190 on the elimination of violence and harassment in the world of work; Article 48 of Organic Law 3/2007, of March 22, for the effective equality of women and men; Article 12 of Organic Law 10/2022, of September 6, on the comprehensive guarantee of sexual freedom; Royal Decree 901/2020, of October 13, which regulates equality plans and their registration and amends Royal Decree 713/2010, of May 28, on the registration and deposit of collective labor agreements and accords; and Article 14 of Law 31/1995, of November 8, on the Prevention of Occupational Risks.

Indeed, by committing to the measures contained in this protocol, Caminando Fronteras Collective expressly demonstrates and publicizes its intention to adopt a proactive attitude both in the prevention of such behaviors—raising awareness and informing about behaviors not tolerated by the association—and in the dissemination of best practices and the implementation of all necessary measures to manage complaints or claims that may arise in this regard, as well as to resolve them as appropriate in each case.

2 Characteristics and Stages of the Protocol.

In order to fulfill the commitment with which this protocol begins, and under the terms outlined so far, the Caminando Fronteras Collective association implements a procedure for the prevention of and response to sexual harassment, harassment based on sex, as well as any other behaviors contrary to sexual freedom and moral integrity. The intention is to establish a mechanism that sets out how to act in a comprehensive and effective manner in the face of any of these behaviors. To this end, this protocol brings together the three types of measures established in section 7 of the Annex to Royal Decree 901/2020, of October 13:

1. Preventive measures, including a statement of principles and identification of behaviors that could constitute sexual harassment, harassment based on sex, or behaviors contrary to sexual freedom and moral integrity.
2. Proactive or procedural measures for action against such behaviors, providing a channel for complaints or claims that may arise, as well as applicable precautionary and/or corrective measures.
3. Identification of reactive measures based on the findings and, where appropriate, the disciplinary regime.

2.1 Preventive Protection

2.1.1 Statement of Principles: Zero tolerance for behaviors constituting sexual harassment, harassment based on sex, and any other behaviors contrary to sexual freedom and moral integrity.

The Caminando Fronteras Collective Association formalizes the following statement of principles, emphasizing how relationships between the association's personnel should be conducted and which behaviors are not tolerated within the organization.

This protocol applies to any behavior constituting sexual harassment, harassment based on sex—including those committed in the digital sphere—as well as any other behaviors contrary to sexual freedom and moral integrity that may occur within the Caminando Fronteras Collective.

By implementing this procedure, Caminando Fronteras Collective assumes its commitment to prevent, not tolerate, combat, and prosecute any manifestation of these behaviors within its organization.

Harassment is, by definition, a multifaceted act that affects several legal interests, among which the dignity of the worker stands out as the positive expression of the right to life and to physical, psychological, and moral integrity. The impact on dignity does not preclude that an act of this nature may also cause harm to other legal interests, such as equality and the prohibition of discrimination, honor, self-image, privacy, health, etc. Nevertheless, by definition, it will always be contrary to dignity. Sexual harassment and harassment based on sex always affect the dignity of the victim and constitute discrimination on the grounds of sex.

Within the scope of Caminando Fronteras Collective, behaviors that may constitute sexual harassment and/or harassment based on sex in any of its forms, as well as any other conduct contrary to sexual freedom and moral integrity, will not be permitted or tolerated. The association will sanction not only those who engage in offensive conduct but also those who promote, encourage, and/or tolerate it. All association personnel are obligated to respect the fundamental rights of everyone who is part of Caminando Fronteras Collective, as well as those who provide services within it. In particular, they must refrain from behaviors that are contrary to dignity, privacy, and the principle of equality and non-discrimination, always promoting respectful conduct.

Nevertheless, if any employee believes they are being harassed or becomes aware of a situation of sexual harassment or harassment based on sex, they will have the possibility, through a complaint or claim, to activate this protocol as an internal, confidential, and swift procedure aimed at eradicating such conduct and repairing its effects.

Once the corresponding investigative file has been processed, if any of the aforementioned behaviors are confirmed, Caminando Fronteras Collective will sanction the responsible party, committing to use all its managerial and disciplinary powers to guarantee a work environment that adheres to the principles of occupational health and safety and is free from sexual violence and sexist discriminatory behaviors.

2.1.2 Identification of behaviors.

2.1.2.1. Definition and Behaviors Constituting Sexual Harassment.

According to Article 7.1 of Organic Law 3/2007, of March 22, for the effective equality of women and men, and without prejudice to the provisions of the Penal Code, for the purposes of this protocol, sexual harassment constitutes any verbal or physical behavior of a sexual nature that has the purpose or effect of violating the dignity of a person, in particular when it creates an intimidating, degrading, or offensive environment.

All sexual harassment will be considered discriminatory.

Conditioning a right or the expectation of a right on the acceptance of a situation constituting sexual harassment or harassment based on sex will also be considered an act of discrimination on the grounds of sex.

By way of example, and without being exclusive or limiting, the following behaviors may constitute sexual harassment:

Verbal Behaviors:

Examples of verbal behaviors constituting sexual harassment include, among others, and as analyzed in each particular case, instances of unwelcome sexual advances, propositions or pressure for sexual activity; offensive flirting; suggestive comments, innuendos or obscene remarks; unwanted phone calls or contact via social networks; jokes or comments about sexual appearance.

Non-verbal behaviors:

Displaying sexually suggestive or pornographic photos, objects, or writings; lewd looks; gestures; offensive letters or messages via email or on social networks with clear sexual content.

Physical behaviors:

Deliberate and unsolicited physical contact, unwanted hugs or kisses, excessive and unnecessary physical proximity.

Quid pro quo sexual harassment or sexual blackmail:

Among the behaviors constituting sexual harassment, "quid pro quo" sexual harassment or sexual blackmail can be distinguished. This consists of forcing the victim to choose between submitting to sexual demands or losing or seeing certain benefits or working conditions adversely affected, such as access to professional training, continued employment, promotion, pay, or any other decision related to this matter. Since this involves an abuse of authority, the perpetrator is someone who has the power, directly or indirectly, to grant or withdraw a benefit or working condition

Hostile environment sexual harassment:

In this type of sexual harassment, the harasser creates an intimidating, hostile, degrading, humiliating, or offensive environment for the victim as a result of unwanted attitudes and behaviors of a sexual nature. It can be carried out by any member of the association, regardless of their position or status, or by third parties who are in some way present in the work environment.

2.1.2.2. Definition and Behaviors Constituting Harassment Based on Sex.

Definition of harassment based on sex:

Harassment based on sex is any behavior carried out because of a person's sex, with the purpose or effect of violating their dignity and creating an intimidating, degrading, or offensive environment.

All harassment based on sex will be considered discriminatory.

To determine that a specific situation constitutes harassment based on sex, a series of elements must be present that form a common denominator, among which the following stand out:

a) Harassment, understood as any intimidating, degrading, humiliating, and offensive behavior that originates externally and is perceived as such by the person who suffers it.

b) An objective violation of the victim's dignity, which is also subjectively perceived as such by the victim.

c) Multiple Harm Result: The attack on the dignity of a person who suffers harassment based on sex does not preclude harm to other fundamental rights of the victim, such as the right not to suffer discrimination, or harm to their physical and psychological health, etc.

d) Not an Isolated Incident.

e) The motive behind these behaviors must be related to the fact of being a woman or due to circumstances that biologically can only affect women (pregnancy, maternity, breastfeeding), or that are related to reproductive and caregiving functions that, as a result of social discrimination, are presumed to be inherent to women. In this sense, harassment based on sex can also be suffered by men when they perform functions, tasks, or activities related to roles historically attributed to women—for example, a male worker who is harassed for being involved in the care of children or dependents.

Conditioning a right or the expectation of a right on the acceptance of a situation constituting harassment based on sex will also be considered an act of discrimination on the grounds of sex.

Harassment based on sex can be perpetrated by superiors, colleagues, or subordinates. It is rooted in gender stereotypes and roles and is usually aimed at demeaning people of a particular sex—especially women—undervaluing their abilities, technical skills, and competencies.

Behaviors Constituting Harassment Based on Sex:

By way of example, and without being exclusive or limiting, the following are a series of specific behaviors which, if carried out repeatedly and meeting the requirements outlined in the previous section, could constitute harassment based on sex in the workplace:

Attacks through organizational measures:

1. Judging a person's performance in an offensive manner, hiding their efforts and abilities.
2. Questioning and undermining the person's decisions.
3. Not assigning any tasks or assigning meaningless or degrading tasks.
4. Denying or hiding the means to perform the work or providing incorrect information.
5. Assigning tasks that are far above or far below the person's skills or qualifications, or that require much less qualification than the person possesses.
6. Giving contradictory or impossible orders.
7. Theft of belongings, documents, work tools, deleting computer files, tampering with work tools to cause harm, etc.
8. Threats or pressure against people who support the harassed person.
9. Manipulation, concealment, or return of the person's correspondence, calls, messages, etc.
10. Denial of or difficulties in accessing leave, courses, activities, etc.

Actions intended to isolate the recipient:

1. Changing the person's location by separating them from their colleagues (isolation).
2. Ignoring the person's presence.
3. Not speaking to the person.
4. Restricting colleagues from talking to the person.
5. Not allowing the person to express themselves.
6. Avoiding all eye contact with the person.
7. Eliminating or restricting the communication means available to the person (telephone, email, etc.).

Activities that affect the victim's physical or psychological health:

1. Threats and physical assaults.
2. Verbal or written threats.
3. Shouting and/or insults.
4. Frightening phone calls.
5. Provoking the person, forcing them to react emotionally.
6. Intentionally causing expenses to harm the person.
7. Causing damage to the workplace or to their belongings.
8. Requiring the person to perform dangerous work or work harmful to their health.

Attacks on private life and personal or professional reputation:

1. Manipulating personal or professional reputation through rumors, denigration, and ridicule.
2. Implying that the person has psychological problems, attempting to have them undergo a psychiatric examination or diagnosis.
3. Mocking gestures, voice, physical appearance, disabilities, giving nicknames, etc.
4. Criticizing nationality, attitudes and political or religious beliefs, private life, etc.

2.1.2.3. Violence in the digital sphere.

When the behaviors referred to in this Protocol occur using information and communication technologies, through the internet, telephone, and social networks (it is not necessary for the aggressor and the victim to have physical, in-person contact), these will be considered digital violence or cyberviolence.

The State Strategy to Combat Gender-Based Violence 2022–2025, based on the recommendations of the first evaluation report of the Group of Experts on Action against Violence against Women and Domestic Violence (GREVIO) from November 2021, establishes that three specific dimensions of digital violence must be taken into account: online and technology-facilitated harassment, online sexual harassment, and the digital dimension of psychological violence, each with the following implications:

Online and technology-facilitated harassment

1. Threat (sexual, economic, physical, or psychological).
2. Damage to reputation.
3. Surveillance and collection of private information (spyware) (1).
4. Identity theft.
5. Solicitation of sex.
6. Harassment with accomplices to isolate the victim.

Online sexual harassment

1. Threat or non-consensual dissemination of images or videos (revenge porn).
2. Non-consensual taking, production, or capture of intimate images or videos.
3. Exploitation, coercion, and threats (sexting, sextortion, threat of rape, doxing (3), outing (4).
4. Sexualized bullying (5).
5. Cyberflashing (6).

(1) Spyware is software designed for this purpose.

(2) This includes acts of "upskirting" (taking photos under a skirt) and taking "creepshots" (secret, sexualized photos)123, as well as the production of digitally altered images in which a person's face or body is superimposed ("fake pornography") using artificial intelligence.

(3) Disclosing personal information or identity.

(4) Disclosing sexual orientation.

(5) Rumors, posting sexualized comments, identity theft, sharing sexual content or sexual harassment of others, thus affecting their reputation and/or livelihood.

(6) Sending unsolicited sexual images via dating or messaging apps, texts, or using technologies such as AirDrop or Bluetooth.

* As noted in the Recommendation, this usually consists of tactics such as monitoring or spying on the victim across various social networks or messaging platforms, their emails, and their phone, stealing passwords or cracking or hacking their devices to access their private spaces, by installing spyware or geolocation applications, or by stealing their devices. Perpetrators may also assume the identity of the victim or monitor them through technological devices connected via the Internet of Things, such as smart home appliances.

Digital dimension of psychological violence

1. All forms have a psychological impact.
2. Individual acts not classified as crimes, which, when combined with mass mentality and repetition, have an effect.
3. Sexist hate speech.
4. Intimidation, threats to victims or their families, insults, shaming, and defamation.
5. Incitement to suicide or self-harm.
6. Economic abuse (7).

(7) Online banking operations, deterioration of the victim's credit rating through unauthorized use of cards, or financial contracts without consent.

2.1.2.4. Criminal behaviors contrary to sexual freedom and moral integrity.

Article 12 of Organic Law 10/2022, of September 6, on the comprehensive guarantee of sexual freedom, establishes that all associations must promote working conditions that prevent the commission of crimes and other behaviors against sexual freedom and moral integrity in the workplace.

For the purposes of this protocol, it is important to clarify that when there are indications that the reported behavior constitutes a crime, the association will immediately adopt the necessary precautionary measures to protect the victim from the aggressor and will urgently refer the case to the Public Prosecutor's Office.

Among the relevant criminal behaviors here, it is useful to distinguish between those contrary to moral integrity and those contrary to sexual freedom.

Regarding the former, crimes against moral integrity, reference should be made to Article 173 of the Penal Code, which states: *"Anyone who inflicts degrading treatment on another person, seriously undermining their moral integrity, shall be punished with imprisonment for six months to two years. The same penalty shall apply to those who, in the context of any employment or official relationship and taking advantage of their position of superiority, repeatedly carry out hostile or humiliating acts against another that, without amounting to degrading treatment, constitute serious harassment of the victim. The same penalties shall be imposed on those who address another person with sexual expressions, behaviors, or propositions that create an objectively humiliating, hostile, or intimidating situation for the victim, without constituting other more serious crimes".*

Regarding the latter, that is, crimes against sexual freedom, Title VIII of the Penal Code distinguishes between:

a) CHAPTER I. Sexual assaults (art. 178, art. 179, art. 180).
b) CHAPTER II. Sexual assaults against minors under sixteen (art. 181, art. 182, art. 183, art. 183 bis).
c) CHAPTER III. Sexual harassment (art. 184).
d) CHAPTER IV. Crimes of exhibitionism and sexual provocation (art. 185, art. 186).
e) CHAPTER V. Crimes relating to prostitution, sexual exploitation, and corruption of minors (art. 187, art. 188, art. 189, art. 189 bis, art. 189 ter).

2.2 Procedure for Action

Schematically, the phases and maximum timeframes for carrying out the procedure are as follows:

Filing a Complaint or Claim

Activation of the Harassment Protocol
Maximum timeframe: 2 working days

Investigative Report
Maximum timeframe: 10 working days

Resolution of the Harassment Case
Maximum timeframe: 3 working days

Follow-up
Maximum timeframe: 30 calendar days

The procedure to be followed is as follows:

2.2.1. Filing the complaint or claim, activation of the protocol, and processing of the administrative file.

1. The association appoints an impartial person as the investigator to handle any complaint or claim received regarding sexual harassment, harassment based on sex—including those committed in the digital sphere—or any other behavior contrary to sexual freedom and moral integrity, to investigate it and conduct follow-up. In the event of absence due to vacation, illness, or any other legal reason, a substitute will be appointed. For appropriate purposes, all individuals providing services within the organization will be informed of this appointment, and it will be clearly and concisely stated how such complaints or claims can be submitted.
2. The complaint may be submitted by the person who feels harassed or has suffered any of these behaviors, or by anyone who becomes aware of such a situation.
3. The email inbox for submitting complaints or claims regarding these behaviors is protocolo@caminandofronteras.org. Only the person designated to manage the protocol will have access to the emails sent for this purpose.
4. Complaints or claims may also be submitted in paper form, in a sealed envelope. For this purpose, the mailbox for depositing such complaints or claims will be located at Observatorio de Derechos Humanos Samba Martine, Calle de los Cañizares, 5 - 28012, Madrid.
5. Confidentiality must be guaranteed regardless of the method by which complaints are processed. Upon receipt of a complaint, the person responsible for handling it will assign a numerical code to each of the affected parties.
6. Once received, within a maximum period of 2 working days, the procedure for processing it will be activated. Any complaint or claim submitted will be presumed to be truthful.
7. The investigator handling the complaint or claim will first attempt to process the complaint informally. If the conflict cannot be resolved through the informal procedure, a rapid and confidential investigation will be conducted within 10 working days, during which the affected parties and proposed witnesses will be heard, and any necessary documentation will be requested, without prejudice to the provisions regarding personal data protection and confidential documentation. Those who are requested to participate must cooperate as diligently as possible.

   In any case, impartiality in their actions will be guaranteed. Therefore, if there is any kinship by blood or marriage with any of the persons affected by the investigation, close friendship, manifest enmity with those affected by the procedure, or a direct or indirect interest in the specific process, the investigator must recuse themselves and inform the association so that a replacement can be appointed. If, despite the existence of these causes, recusal does not occur, any of the persons affected by the procedure may request the disqualification of said person.

8. During the processing of the case file, the victim will first be heard, followed by the accused person. Both parties involved may be assisted and accompanied by a person of their choice, whether or not they are part of the legal and/or union representation of the workers, who must maintain confidentiality regarding any information they access. In compliance with the principle of contradiction, the accused party will always be given the opportunity to be heard.

9. The procedure must be as swift and effective as possible and must, in all cases, protect the privacy, confidentiality, and dignity of the affected individuals, as well as the right of the accused to respond. Throughout the entire procedure, strict confidentiality will be maintained, and all internal investigations will be conducted with tact and due respect for both the victim and/or complainant—who must never be subjected to unfavorable treatment for this reason—and the accused, whose guilt will not be presumed. All persons involved in the process are required to maintain confidentiality and secrecy regarding all information to which they have access.

10. During the processing of the case file, at the proposal of the investigator, the management of the association will adopt the necessary precautionary measures to ensure the immediate cessation of the harassment situation, without such measures resulting in permanent and definitive harm to the working conditions of the individuals involved. In addition to other precautionary measures, the management of Caminando Fronteras Collective will separate the alleged harasser from the alleged victim.

11. Once the investigation is complete, the person who processed the case file will prepare a report summarizing the facts, testimonies, evidence taken and/or collected, and will conclude whether, in their opinion, there are indications of harassment in any of its forms, or of any other behavior contrary to sexual freedom and moral integrity.

    If the evidence indicates the presence of harassment in any of its forms, or of any other behavior contrary to sexual freedom and moral integrity, the investigator will, in the conclusions of the report, urge the association to adopt appropriate disciplinary measures, which may include, in very serious cases, proposing the disciplinary dismissal of the perpetrator.

    If the evidence does not indicate the presence of sexual harassment, harassment based on sex, or other conduct contrary to sexual freedom and moral integrity, the investigator will record in the report that, based on the evidence expressly collected, such conduct cannot be established.

    If, even in the absence of harassment in any of its forms or conduct contrary to sexual freedom and moral integrity, some inappropriate action or behavior subject to sanction is detected, the investigator will also urge the management of Caminando Fronteras Collective to adopt any measures deemed appropriate in this regard.

12. None of these actions will prevent the individuals involved from seeking any judicial, administrative, or other actions they consider appropriate.

13. If, based on the complaint submitted, the investigator finds indications of criminal conduct, they will forward the case to the management of Caminando Fronteras Collective, proposing the immediate adoption of the appropriate precautionary measures to separate the victim from the alleged harasser and the urgent referral of the case to the Public Prosecutor's Office. Regardless of any other precautionary measures that may be adopted, the alleged harasser will always be separated from the victim, and under no circumstances will the victim be required to change their position, schedule, or location within the association.

2.2.2. Resolution of the Harassment Case.

The management of Caminando Fronteras Collective, once it has received the investigator's conclusions, will make the decisions it deems appropriate within a period of 3 working days, being the only body authorized to decide on the matter. The decision will be communicated in writing to the victim, the accused, and the investigator.

Likewise, the final decision in the case will also be communicated to the legal representatives of the workers, if any, and to the person responsible for occupational risk prevention. In this communication, in order to guarantee confidentiality, no personal data will be provided and the numerical codes assigned to each of the parties involved in the case will be used.

In light of the conclusions report prepared by the investigator, the management of Caminando Fronteras Collective will proceed to:

a) Archive the proceedings, recording this in the minutes

b) Adopt any measures it deems appropriate based on the suggestions made by the investigating committee. By way of example, among the decisions the association may adopt in this regard are the following:

    a) Physically separate the alleged aggressor from the victim, by changing their position and/or shift or schedule. Under no circumstances will the victim be required to change their position, schedule, or location within the association.

    b) Without prejudice to the above, if appropriate and depending on the results of the investigation, the aggressor will be sanctioned in accordance with the table of infractions and sanctions provided for in the applicable collective agreement or, where appropriate, in Article 54 of the Workers' Statute.

Among the sanctions to be considered for the aggressor are the following:

1. Transfer, relocation, change of position, working hours, or location
2. suspension from employment and salary
3. temporary limitation on promotion
4. disciplinary dismissal.

In the event that the sanction imposed on the aggressor is not the termination of the contractual relationship, the management of Caminando Fronteras Collective will maintain an active duty of supervision over that employee upon their return (if suspended), or in their new position in the event of a change of location. In any case, the obligation to eradicate the aggressive behavior will not end with the mere adoption of a job change or suspension; ongoing monitoring and control by the association will be necessary.

The management of Caminando Fronteras Collective will adopt the necessary preventive measures to avoid repeated behavior or conduct by the aggressor, will reinforce training and awareness-raising actions, and will implement measures to protect the safety and health of the victim, including, among others, the following:

- Assessment of psychosocial risks within the association, including sexual violence as an occupational risk.
- Adoption of monitoring measures to protect the victim.
- Implementation of measures to prevent recidivism by sanctioned individuals.
- Psychological and social support for the victim.
- Modification of working conditions that, with the prior consent of the victim of harassment, are considered beneficial for their recovery.
- Training or retraining for the professional updating of the harassed person when they have been on medical leave for a prolonged period.
- Implementation of new training and awareness-raising actions for the prevention, detection, and response to sexual violence, sexual harassment, and harassment based on sex, aimed at all those providing services in the association.
- Providing information and training to female workers about the risks of experiencing sexual violence in their workplaces.

2.2.3. Follow-up.

Once the case file is closed, and within no more than thirty calendar days, the person responsible for processing and investigating the complaint or claim will be required to carry out follow-up on the agreements reached, that is, on the compliance with and/or outcome of the measures adopted. The results of this follow-up will be documented in a report that will include proposals for further measures in the event that the behaviors leading to the procedure persist, and will also analyze whether the proposed preventive and disciplinary measures have been implemented, as appropriate. This report will be sent to the association's management so that the necessary measures can be taken, as well as to the legal representatives of the workers, if any, and to the person responsible for occupational risk prevention, with the safeguards regarding the confidentiality of the personal data of the affected parties as outlined in the procedure.

Follow-up will also be carried out in situations where, because the behaviors may constitute a crime, the association has adopted the corresponding precautionary measures and has referred the complaint to the Public Prosecutor's Office.

3 Duration, mandatory compliance, and entry into force.

The content of this protocol is mandatory and comes into effect upon its communication to the association's staff (March 20, 2024) via the email address info@caminandofronteras.org, remaining in force until the approval of a new protocol at an Ordinary or Extraordinary Assembly.

Nevertheless, it will be necessary to review and adapt the protocol in the following cases:

- At any time during its validity in order to redirect efforts to achieve its objectives of prevention and action against sexual harassment, harassment based on sex, or any other behavior contrary to sexual freedom and moral integrity.
- When it is found to be inadequate in meeting legal and regulatory requirements, or insufficient as a result of actions by the Labor and Social Security Inspectorate.
- In cases of merger, absorption, transfer, or modification of the association's legal status, and in the event of any incident that substantially changes the association's staff, working methods, or organization.
- When a judicial decision convicts the association for failing to prevent and eradicate behaviors contrary to sexual freedom and/or moral integrity, or determines that the protocol does not meet legal or regulatory requirements.
- Whenever necessary due to duly justified circumstances.

This procedure does not prevent the victim's right to file a complaint, at any time, with the Labor and Social Security Inspectorate, as well as with the civil, labor, or criminal courts.

4 Complaint or Claim Form for the Caminando Fronteras Collective Association.

I. Person Reporting the Facts

Person who has suffered the harassment:
Others (Specify):

II. Details of the Person Who Has Suffered the Harassment

Name:
Surname(s):
ID Number:
Position:
Type of contract/Employment relationship:
Telephone:
Email:
Address for notifications:

III. Details of the Aggressor

Name and surname(s):
Professional group/category or position:
Workplace:
Name of the association:

IV. Description of the Facts

Provide an account of the reported facts, indicating the date(s) and place(s) where they occurred and including possible witnesses. Attach as many numbered pages as necessary.

4 Complaint or Claim Form for the Caminando Fronteras Collective Association.

V. Witnesses and/or Evidence

If there are witnesses, indicate their full name(s):

Attach any evidence you consider appropriate (emails, WhatsApp messages, voice recordings, calls, videos, medical leave documents, etc.).

VI. Request

I request that this complaint or claim against (IDENTIFY AGGRESSOR) be accepted and that the procedure established in this protocol for the prevention and action against sexual harassment, harassment based on sex, and other behaviors contrary to sexual freedom be initiated.

Location and date:

Signature:

To the attention of the person responsible for handling the complaint or claim procedure regarding sexual harassment, harassment based on sex, and other behaviors contrary to sexual freedom at the Caminando Fronteras Collective.

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