



# ROUTINES AND ACTIONS FOR STUDENTS AT SÖDERTÖRN UNIVERSITY IN CASES OF DISCRIMINATION, HARASSMENT AND SEXUAL HARASSMENT

## 1 Introduction

The equal rights and human dignity of all are the foundation of activities at Södertörn University. We reject all forms of discrimination, harassment due to sex, transgender identity or expression, ethnicity, religion or other belief, sexual orientation, disability and/or age, sexual harassment and reprisals or victimisation. Södertörn University will not accept these occurring in its activities.

This document describes the action to be taken by Södertörn University in cases of discrimination against and/or the harassment, sexual harassment and victimisation of students.<sup>2</sup> Contact details and appendices relating to comments on the Swedish Discrimination Act, comments on work environment legislation and Södertörn University's supplementary routines in cases of discrimination, or sexual harassment and victimisation of students who are on placements are at the end of the document.

We are all responsible for creating a good study environment at the university, so it is natural for us to treat each other with respect. We also defend and take an active position for the equality of dignity and rights for everyone, and work against discrimination, harassment, sexual harassment and other victimisation.

Södertörn University works to prevent discrimination, harassment, sexual harassment and other victimisation by offering all employees and students a good introduction, clarifying objectives and expectations and providing good role models. Södertörn University's preventive work also includes employees and students having knowledge of the laws, rules and instructions that apply to the university and the students' education.

Preventive work raises the standard of activities and provides a safe and secure environment for students.

The measures that are planned to prevent discrimination, harassment, sexual harassment and other victimisation are described in Södertörn University's work with active measures for equal treatment, available at [www.sh.se](http://www.sh.se). (Search for equal treatment of students at the university.)

## 2 Laws and provisions

The legal basis for anti-discrimination is found in the Instrument of Government, one of Sweden's constitutional laws. Discrimination, harassment and sexual harassment are regulated in the Discrimination Act (2008:567). Work on the work environment for all students is part of Södertörn University's work on the study environment and is based partly on the Discrimination Act, partly on the Work Environment Act (1977:1160) and the Provisions on Systematic Work Environment Management (AFS 2001:1). The university's routines and guidelines use the concept of other victimisation for situations that have a negative influence on the study environment but which are not covered by the Discrimination Act.

The Discrimination Act prohibits discrimination in ten different areas of society, including education (Chapter 2, Sections 5–8). The purpose of the Act is to combat discrimination and in other ways promote equal rights and opportunities regardless of sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age.

The Discrimination Act (Chapter 1, Section 5) defines the grounds of discrimination as follows.

- Sex: that someone is male or female. A person who has undergone, or is planning to undergo, sex reassignment is also covered by sex as a grounds of discrimination.
- Transgender identity or expression: that someone does not identify themselves as a woman or a man or expresses by their manner of dressing or in some other way that they belong to another sex.
- Ethnicity: national or ethnic origin, skin colour or other similar characteristic.
- Religion or other belief: Religion refers to religious beliefs, such as Hinduism, Judaism, Christianity or Islam. Other beliefs include convictions that are based on or connected to a religious belief, such as Buddhism, atheism and agnosticism.
- Political convictions and ethical or philosophical values that are not related to religion are not covered by the Discrimination Act.
- Disability: permanent physical, mental or intellectual limitation of a person's functional capacity that as a consequence of injury or illness existed at birth, has arisen since then or can be expected to arise.

- Sexual orientation: homosexual, bisexual or heterosexual orientation.
- Age: the length of life reached.

## **2.1 Discrimination**

Discrimination means an act of bias that cannot be considered objectively motivated. In other words, that someone is disadvantaged by being treated less favourably than someone else is treated in a comparable situation and which is associated with one of the prohibited grounds of discrimination. For example, it may be a case of discrimination if premises are not accessible or useable for people with disabilities.

## **2.2 Indirect discrimination (amended in accordance with the legislation)**

Indirect discrimination means that a student or applicant is disadvantaged by the application of a provision, a criterion or a procedure that appears neutral, but which may particularly disadvantage people associated with one of the grounds of discrimination. However, it is not indirect discrimination if the following criteria are fulfilled:

- The purpose of the rule or routine is legitimate, i.e. justified and objectively acceptable. This means that the purpose must be worthy of protection in itself and be of enough importance to take precedence over the principle of non-discrimination.
- The means used are suitable and necessary for achieving the purpose. This means that there are no other alternatives or means of achieving the purpose.

## **2.3 Inadequate accessibility:**

Inadequate accessibility is when a person with disability is disadvantaged through a failure to take measures for accessibility to enable the person to come into a situation comparable with that of persons without this disability.

These measures must be reasonable. This means that the person must be able to participate in activities, but that this does not always have to take place in exactly the same way as is possible for people without this disability. However, the differences may not be greater than are objectively necessary. The law entails making an assessment from case to case and evaluating what are reasonable measures.

## **2.4 Harassment**

In this context, harassment means that someone behaves in a manner that violates the dignity of a student or applicant and which is associated with one of the grounds of discrimination. (Discrimination Act, Chapter 1, Section 4, item four) For example, this could be:

- ridiculing comments (taunts, jokes, mockery) about clothing, appearance, speech or behaviour that refer to the person's sex, transgender identity or expression, ethnicity, religion or other belief, sexual orientation, disability, age.

- unintentional insults, defamation, slander or exclusion founded on the same reasons as above and if someone is disadvantaged for the same reasons as above, for example when evaluating study performance.

Such unwelcome and unwanted behaviours can create a study environment that is offensive to the person subjected to them. It is the person who has been subjected to this who decides what is undesirable or violates their dignity. The harasser must be aware that their behaviour is offensive. For the harasser to be aware their behaviour is offensive, the person being harassed should therefore make it clear to the harasser that their behaviour is experienced as unwanted and offensive. Here, someone trusted by the person being harassed can be helpful. However, in some cases, it may be that the harasser must be aware that their behaviour is considered offensive in the legal sense.

If a student confirms that they have been harassed, but do not want the university to pursue the issue, the university cannot pursue the issue against the person's will. However, the university should try to encourage the student to explain what has happened, provide information about the student's rights and take general preventive measures to prevent harassment in the future.

Many of these behaviours or actions are also criminal acts. The legislation that may be relevant applies to, for example, defamation, insulting behaviour, harassment, sexual harassment and sexual abuse, as well as hate speech.

## **2.5 Sexual harassment**

Sexual harassment means conduct of a sexual nature that violates someone's dignity. From the perspective of the victim, it must be an undesirable action or behaviour.

Examples of this are demands for sexual services or sexual relationships that

- are explicitly or implicitly presented as a condition for access to education,
- are associated with threats of punitive measures, such as missing out on a grade for a student, inappropriate demands on study performance, unfounded criticism, reduced supervision, exclusion or spreading rumours,
- are associated with promises of rewards, such as positive performance evaluations.
- It may also be using words, actions, behaviours, etc., of a sexual nature to create a hostile, threatening or offensive study environment that prevents or disrupts a colleague or student, such as by:
  - physical behaviour of a sexual nature, i.e. unwanted physical contact through touching, patting, pinching or stroking another person's body. (Rape or attempted rape falls under the provisions of the Swedish Penal Code.)
  - verbal conduct of a sexual nature, i.e. unwelcome suggestions or pressure regarding sexual interaction. This may involve repeated suggestions for social activity outside the university, despite it being clear that such suggestions are unwelcome. Approaches that are

carried out in an offensive manner is another example. Insinuating remarks and sexual innuendoes or comments using offensive language are other examples of verbal behaviour. The behaviour described above defines the offended person as a sexual object rather than as a student and fellow student.

- non-verbal conduct of a sexual nature, i.e. pornographic images, objects or written material. It may also include whistling, staring or making offensive gestures.

## **2.6 Instruction to discriminate**

Instruction to discriminate means orders or instructions to discriminate against someone in a manner covered by the provisions on direct discrimination, indirect discrimination, harassment or sexual harassment and which are given to someone who is in a position of dependence or obedience to the person giving the order or instructions or who is under obligation to this person to perform a task.

## **2.7 Reprisals**

A person who is said to have behaved in contravention of the provisions of the Discrimination Act may not subject an individual to reprisals due to them

1. reporting or calling attention to such actions,
2. participating in an investigation under the Act, or
3. rejecting or giving in to harassment or sexual harassment on the part of the person who is claimed to have discriminated.

## **2.8 Other victimisation**

The students' study environment is covered by the Work Environment Act and the Provisions on Systematic Work Environment Management (AFS 2001:1). Södertörn University must investigate, make risk assessments, take action and follow up the students' study environment. Examples of conditions in the study environment that are important to be aware of are conflicts between students or between teachers and students, including those that cannot be directly linked to grounds of discrimination.

## **2.9. Obligation to investigate**

Södertörn University investigates all types of discrimination, harassment, victimisation or other victimisation of students and applicants.

## **2.10 Disciplinary cases**

If a student subjects another student or an employee to the harassment or sexual harassment stated in Chapter 1 Section 4 of the Discrimination Act (2008:567), a disciplinary report must be made to the vice-chancellor. The disciplinary measures are warning and suspension.

If the situation requires it, the vice-chancellor, after consultation with the Disciplinary Board's legally-qualified member, may decide on interlocutory suspension of up to one month (Chapter 10 Sections 1 and 14 of the Swedish Higher Education Ordinance).

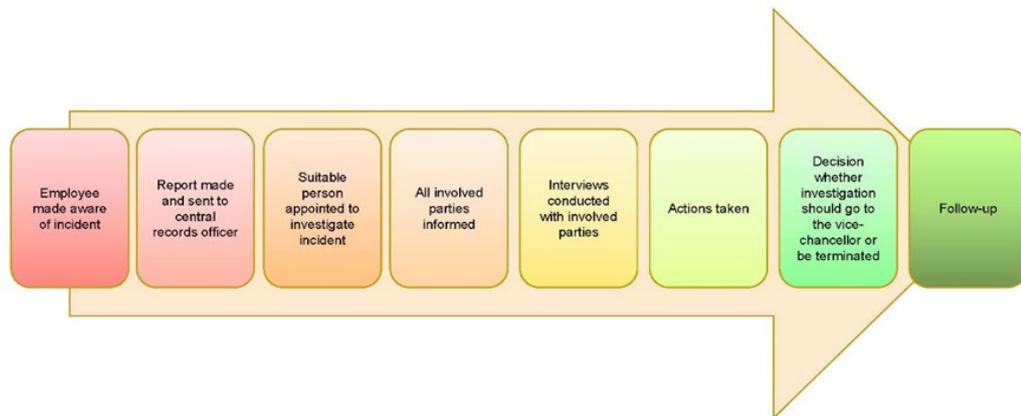
## **2.11 Appeal**

A decision by the university that contravenes the prohibition on discrimination or the prohibition on reprisals may, in accordance with Chapter 4 Section 18 of the Discrimination Act, be appealed to the Higher Education Appeals Board if the decision concerns

- admission to education,
- credit for education,
- deferment of studies or resumption of studies after time off from studies,
- a change of supervisor
- withdrawal of a supervisor and other resources in third-cycle courses and study programmes,
- a disciplinary measure against a student.

### 3 Routines and measures

Work process in cases of discrimination, harassment, sexual harassment and other victimisation



Sometimes, differences of opinion and conflicts can arise and they should primarily be solved through dialogue between the parties. When necessary, students and staff can be helped by the relevant teacher, course coordinator, programme coordinator or equal treatment officer in Student Support Services.

#### 3.1. Obligation to take action

Students or applicants to the university who feel they have been subjected to discrimination, harassment or who have been treated in an offensive manner by another student or an employee, must contact someone at the university that they trust. It does not need to be the student or applicant themselves who contacts the university's staff and makes the university aware of the situation. As employee who learns that a student or applicant feels harassed, discriminated or victimised must inform the head of school or the director of the unit where the incident occurred. The employee must act promptly.

#### 3.2 Reporting

If the student wishes to make a formal report, this is submitted to the vice-chancellor, either by the student or the member of staff who received the report. There are no requirements for the format of a formal report; it could, for example, be made orally and documented in writing by an employee.

The report must be registered. The investigation is public, but some information in the investigation may be covered by confidentiality. Information that an investigation is ongoing and about who is performing it is appended to the report.

### **3.3 Investigation**

The head of school or unit director must investigate the incident or give the task of investigating to an employee at the school or unit. Support for this work is available from the equal treatment officer at Student Support Services. Neither a written report nor anything showing that harassment, sexual harassment or other victimisation has occurred is necessary to initiate an investigation.

The investigation must be objective and impartial and conducted with discretion. The person investigating the incident must contact the relevant parties. Depending on the type of incident, contact can also be made with, for example, the university counsellor, equal treatment officer, head of security, study and careers guidance counsellor, human resources, student health services, the students' union, student ombudsman, etc. An investigation normally includes both oral and written material and the process must be documented in writing. The head of school or unit director must receive continual information about the case.

During the investigation, it may be necessary to submit a disciplinary case or an appeal to the Higher Education Appeals Board, for which the Swedish Higher Education Authority is responsible. More information about this is available in item 2.9. Disciplinary cases and 2.10. Appeals.

### **3.4 Interviews**

During the investigation, interviews must be conducted with the relevant parties and any witnesses. The first interview takes place with the parties individually, and they must have the chance to have a supporting person or student representative present. In some cases, it may be appropriate for the university to organise a supporting person with knowledge of the university's activities for the student.

Interviews must include the following:

- A description of what occurred (what, when, where, how, who, which, etc.).
- Information about how the case will be processed.
- Information about the Discrimination Act and the university's approach to discrimination, harassment and victimisation.
- Information about the available support.
- Information about potential measures.
- Checking and documenting the interview and the action to be taken.

During the investigation, it must be established whether discrimination, harassment, sexual harassment or other victimisation has occurred. If the student wishes to stop the investigation, the university must comply.

### **3.5 Decision**

The investigation must result in written documentation that states what has happened and whether action will be taken and, if so, what. Even if a student has chosen to stop the investigation, the investigator must suggest measures that may prevent similar situations to the head of school or unit director. The investigation must be submitted to the head of school or unit director, who decides on the case. The relevant parties must be informed of the decision by the head of school or unit director and it must be documented. If the head of school or unit director feels that discrimination, harassment, sexual harassment or other victimisation has occurred, the case must be submitted to the vice-chancellor, who decides whether it should be transferred to the university's Disciplinary Board or Staff Disciplinary Board.

### **3.6 Actions and follow-up**

After an investigation is concluded, the decided actions must be taken and the head of school or unit director must follow up the case. Interviews with the parties in the case must establish whether the actions have had the desired effect. The follow-up is conducted by the head of school or unit director a few weeks after the actions are taken. If further action is necessary, this must be done immediately. The follow-up must also establish whether the complainant or others who participated in the investigation have been subject to reprisals.

### **3.7 Required documentation**

Investigations of discrimination, harassment, sexual harassment and other victimisation must be documented in writing. In addition, the actions taken and planned to prevent harassment and sexual harassment must also be documented in writing. This includes presenting these guidelines and routines to prevent such harassment.

### **3.8 Contact**

Please contact Student Support Services if you have questions about routines and measures at Södertörn University. Information is also available on [www.sh.se](http://www.sh.se) and on Södertörn University's student intranet.

Students at Södertörn University can also access

- student health services, <https://ki.se/utbildning/studenthalsan>
- counselling, [kurator@sh.se](mailto:kurator@sh.se)
- study and careers guidance, [studier.karriar@sh.se](mailto:studier.karriar@sh.se)
- disability support, [funka@sh.se](mailto:funka@sh.se)
- students' union – SöderS, [info@soders.nu](mailto:info@soders.nu)

Södertörn University also has a chaplaincy, which offers a place to talk:  
elisabet.ravelojaona@andreaskyrkan.se or baldur.baldursson@svenskakyrkan.se.

For information about discrimination and harassment, please visit [www.do.se](http://www.do.se), the Equality Ombudsman.

## APPENDIX 1

### A summary of the Discrimination Act

The below comments are about how some of the concepts in the Discrimination Act are interpreted. More information (in Swedish) is available in the book Diskrimineringslagen by Håkan Gabinus Göransson, Martina Slorach, Stefan Flemström and Naiti del Sante, Norstedts juridik, Stockholm 2011.

#### 1 Discrimination

Protection against discrimination applies to both interpersonal interaction, actions and decision-making that relates to employees, students or applicants to the university. Examples of decisions that are covered by this are deferment of studies, changing supervisors and examination. For something a person does or does not do to be discrimination, three criteria must be met.

- Disadvantage – the employee, student or applicant must have been put in a poorer position or lost out on something. This usually refers to an actual loss, but discomfort and personal suffering due to harassment can also be regarded as a disadvantage.
- Comparison – the employee, student or applicant must have been treated in a manner that deviates from how others are treated, have been treated or would have been treated. If there is no actual person to compare with, a comparison is made with a hypothetical person, i.e. a hypothetical comparison.
- Causation – there must be an association between the disadvantage and one or more of the grounds of discrimination. It is not necessary for there to be an intention to discriminate, instead it is the effect of the action that is relevant.

#### 2 Indirect discrimination

Indirect discrimination occurs when a specific procedure, criterion or regulation that appears neutral is applied. There are three criteria to consider for indirect discrimination. The first is disadvantage and the meaning is the same as for direct discrimination. The second criterion is comparison; here an actual comparison is made. The third criterion is the purpose of applying the procedure, criterion or regulation. The purpose of the disadvantage must be objectively acceptable and the action must also be appropriate and necessary for achieving the purpose.

#### 3 Harassment – criteria and what is included

Harassment is interaction, behaviours or actions that violate someone's dignity in a manner that is linked to one or more of the grounds of discrimination or is of a sexual nature. For

example, for an interpersonal interaction to constitute harassment, the following factors must be met:

- Disadvantage – the interaction, behaviour or action must entail injury or unpleasantness. The violation of someone's dignity must be clear and noticeable.
- Unwanted – the interaction, behaviour or action must be unwanted; it is the affected person who decides this. In other words, in cases of harassment, there is to be no comparison with what can typically violate a person's dignity.
- Insight – the harasser must realise that that the interaction, behaviour or action insults someone in a discriminatory manner, either because it is obviously a violation or because the affected person makes it clear that the behaviour is experienced as such.
- Causation – the interaction, behaviour or action must have an association with one of the grounds of discrimination, but there does not need to be a direct link. An attitude or a joke that does not target one or more individuals is not usually included in the prohibition on harassment. However, an action or an interaction that in itself appears harmless can be harassment if it is repeated.

#### 4 Sexual harassment – criteria and what is included

The prohibition on sexual harassment, like harassment, is built around the criteria of disadvantage, unwanted behaviour and insight. In addition, the violation must be of a sexual nature; it relates to all forms of unwelcome physical contact, as well as proposals and advances, as well as offensive comments and innuendoes. The most serious forms of sexual harassment are punishable by law.

## APPENDIX 2

### The Swedish Work Environment Act applies to students – the following text is from the Swedish Work Environment Authority's memo about students' work environment.

Remember that the Work Environment Act and the Provisions on Systematic Work Environment Management (AFS 2001:1) apply to students.

The Work Environment Act says that the employer, in these cases ultimately each higher education institution's management, must take any actions necessary to prevent ill-health and accidents (Chapter 3, Section 2 of the Work Environment Act). The Work Environment Act also states that the employees, in these cases the students, must have the opportunity to participate in shaping their own work situation and in change and development work that relates to their own work (Chapter 2, Section 1 of the Work Environment Act).

#### Organisational and social factors in the study environment

Preventive work on risks linked to psychosocial conditions in the work environment is part of systematic work environment management. For example, this could include ensuring the all students know what results they need to achieve to fulfil the demands of their course or programme, providing feedback and clarifying what support is available.

#### Cooperation and student safety representatives

Cooperation is regulated in Chapter 6 of the Swedish Work Environment Act. Section 17 states that those in education must be given the opportunity to participate in work environment management at their workplace by the principal for their education. Section 4 of the Provisions on Systematic Work Environment Management (AFS 2001:1) also regulates this obligation.

The student safety representative is appointed by the students. Responsibility for the students knowing that they are entitled to elect a safety representative lies with the principal for their education. To enable student participation in work environment management, it is important that every higher education institution has a student safety representative.

#### Placements, traineeships and doctoral studentships

Students who have a doctoral studentship are covered by AFS 2015:4 on the organisational and social work environment. It also covers students who performs tasks that are regarded as work as part of their traineeship.

The employer, at the workplace at which the placement or traineeship is undertaken, has the most liability, but the principal is also responsible for protecting the student.

The principals of the higher education institutions need to find out the following, among other things, in their contact with the traineeship provider:

- working hours and that suitable tasks are offered by the traineeship provider
- that a supervisor is appointed and that a suitable introduction is given
- that the necessary protective equipment is provided free of charge
- how the traineeship provider and the higher education institution will communicate regarding incidents, accidents, illness or if other unforeseen events occur.

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Decided by the vice-chancellor 20 November 2018

## APPENDIX 3

# Supplementary guidelines and routines regarding discrimination, sexual harassment and victimisation during placements or traineeships

Södertörn University is responsible for the students' study environment during their placements and traineeships. The employer within whose organisation the traineeship is conducted is responsible for the work environment of the placement. How this responsibility is allocated should also be regulated in a cooperation agreement between the higher education institution and employer.

This document applies to situations of harassment linked to sex, transgender identity or expression, ethnicity, religion or other belief, disability, sexual orientation or age (here called harassment), sexual harassment and victimisation during placements and traineeships. This document is a supplement to Routines and actions in cases of discrimination, harassment, sexual harassment and other victimisation of students (reg no. 3487-1.1.2-2018). The supplementary guidelines and routines must be seen as a concretisation of Södertörn University's and the employer's responsibility for students during their placements and traineeships and how the legal liability is distributed between the university and the employer.

If, for a particular activity at the university, further decisions are required regarding routines and measures, this is decided within each activity. Local decisions may not deviate from what is decided in this document, they may only supplement it.

## 1 Laws and provisions

### 1.1 Södertörn University's legal liability

#### 1.1.1 The Discrimination Act

As an education provider, Södertörn University must prevent discrimination, harassment and sexual harassment occurring, and take action if the university is made aware of such harassment.

This is laid down in the Discrimination Act (2008:567).

“If an education provider becomes aware that a child, pupil or student participating in or applying for the provider’s activities considers that he or she has been subjected in connection with these activities to harassment or sexual harassment, the education provider is obliged to investigate the circumstances surrounding the alleged harassment and where appropriate take the measures that can reasonably be demanded to prevent harassment in the future.” (Chapter 2, Section 7 of the Discrimination Act)

“The education provider must have guidelines and routines for activities for the purpose of preventing harassment and sexual harassment.” (Chapter 3, Section 18 of the Discrimination Act)

### **1.1.2 Work environment regulations**

The students’ study environment is covered by the Work Environment Act and the Provisions on Systematic Work Environment Management (AFS 2001:1). Södertörn University must investigate, make risk assessments, take action and follow up the students’ study environment.

### **1.1.3 Other regulations**

The university’s own regulations provide definitions of various terminology, what is regulated in the relevant laws and ordinances and information about the university’s internal organisation vis-à-vis discrimination, harassment and sexual harassment. The reader should refer to them for additional information to that given in this document. (See the list at the end of this document.)

The vice-chancellor has delegated responsibility for the students’ work environment and legal certainty to the heads of school and the academic head of Teacher Education. This also includes discrimination, harassment and sexual harassment.

## **1.2 The employer’s legal liability**

### **1.2.1 The Discrimination Act**

An employer may not discriminate against a person who is applying for or undertaking a traineeship at the employer. Harassment and sexual harassment are discrimination. The employer must therefore prevent discrimination, harassment and sexual harassment and take action if the workplace becomes aware of such harassment. This is laid down in the Discrimination Act.

“If an employer becomes aware that an employee considers that he or she has been subjected in connection with work to harassment or sexual harassment by someone performing work or carrying out a traineeship at the employer’s establishment, the employer is obliged to investigate the circumstances surrounding the alleged harassment and where appropriate take the measures that can reasonably be demanded to prevent harassment in the future.

This obligation also applies with respect to a person carrying out a traineeship or performing work as temporary or borrowed labour.” (Chapter 2, Section 3 of the Discrimination Act)

“Employers are to have guidelines and routines for activities to prevent any employee being subjected to harassment, sexual harassment or reprisals as laid down in Chapter 2, Section 18.

The employer must follow up and evaluate its guidelines and routines pursuant to the first paragraph.” (Chapter 3, Section 6)

### **1.2.2 Work environment regulations**

A person undertaking a traineeship within higher education is covered by the Work Environment Act and the Provisions on Systematic Work Environment Management (AFS 2001:1). For placements and traineeships, the workplace must investigate, make a risk assessment, take action and follow up the student or trainee’s work environment.

Students on traineeships are covered by the Provisions on Organisational and Social Work Environment (AFS 2015:4). This means that the workplace is also obliged to investigate victimisation vis-à-vis students on placements and traineeships.

### **1.2.3 Other regulations**

Employers are obliged to conduct preventive work regarding harassment, sexual harassment and victimisation. The workplace’s own routines and guidelines must also include people on placements or traineeships. The workplace is responsible for informing the student about regulations, rules of conduct, etc., that apply at the workplace prior to the start of the traineeship. It is appropriate to clarify this in the cooperation agreement with the university.

## **2 Distribution of liability between Södertörn University and the employer/workplace**

As education provider, the university is responsible for the students’ study environment during their education, and also during placements or traineeships. This means that the university is obliged to investigate information about a student being subjected to discrimination, sexual harassment and victimisation while studying.

The university cannot demand access to the workplace to investigate, which entails that the responsibility to investigate lies with the employer pursuant to the legal provisions above. The university’s liability is therefore related to the study situation in general; it should be regulated in an agreement between the university and the employer that it is the workplace that must initiate and conduct an investigation of alleged discrimination, harassment or sexual harassment. With reference to the university’s responsibility for the student’s study situation, the agreement should state that the employer must ensure that the university has insight into the workplace’s investigation and support to the student. The investigation must be followed up in accordance with existing routines and agreements.

The university may undertake a supplementary investigation during or after the workplace’s investigation of potential harassment, sexual harassment or victimisation. This could be the case if the workplace’s investigation is not assessed as being adequate. The university is

responsible for the routine follow up of cases of harassment and sexual harassment and, when necessary, taking suitable and necessary measures.

## 3 Routines and measures

### 3.1 Prior to the traineeship

A written agreement must be drawn up between the university and the employer prior to start of the traineeship. This must state how liability for the student's work and study environment is distributed between the university and the employer.

Prior to the start of the traineeship, the student must be informed about the parts of the agreement that relate to the work and study environment. The student must also be given information about who they can contact at the university and workplace if they feel they have been subjected to harassment, sexual harassment or victimisation.

### 3.2 In cases of suspicion of discrimination, harassment, sexual harassment and victimisation

If the university becomes aware that a student feels they have been subjected to discrimination, harassment, sexual harassment or victimisation during the placement or traineeship that the student has completed as part of their education, the person who has become aware of this must proceed with the case according to the university's routines.

The head of school or academic head appoints the person who must stay informed about the workplace investigation and perhaps investigate the case at the university.

In cases where the investigation shows that harassment, sexual harassment or victimisation has occurred, the workplace and university must take action to prevent it continuing or being repeated.

The student must receive help and support from the university in accordance with the university's routines. The student must also receive support in reporting what has occurred to the police, when relevant. A police investigation of an incident that falls under the provisions of the Swedish Penal Code does not replace any responsibility to investigate held by the education provider or workplace pursuant to legislation and can therefore be conducted in parallel with other investigations of the incident.

The student must be consulted when assessing whether the student will continue their traineeship or start a traineeship at another workplace.

## Regulations at Södertörn University

Routines and actions in cases of discrimination, harassment, sexual harassment and other victimisation

Delegation of Authority

Equal Opportunities Plan

Equal Opportunities Policy