



Barcelona School
of Tourism, Hospitality
and Gastronomy

CETT GROUP HANDBOOK FOR SITUATIONS OF SEXUAL HARASSMENT AND OTHER SEXIST OR LGTBI PHOBIC CONDUCT

Campus CETT

Integral S.L.

Estudis d'Hoteleria
i Turisme CETT S.A.

Turisvall S.L.

Fundació Gaspar España
CETT

Av. Can Marcet 36-38
08035 Barcelona
T +34 934 280 777
info@cett.cat
www.cett.cat





Introduction

CETT is an international Campus in education and knowledge transfer in tourism, hospitality, and gastronomy attached to Barcelona University. CETT's core values reflect what is truly important to us as an organization and define our attitude, ethos, and culture.

Our Group's companies (CETT Group) provide most of our training programs on Campus: CETT School of Tourism & Hospitality, CETT College, Barcelona Academic Services (BAS), Alimara Hotel, Àgora BCN International Hall of Residence.


CETT Group intends to stop socially unacceptable behavior or behavior which is contrary to the law. For this reason, our Group subscribed to a Code of Conduct and Good Practice that describes values and principles that must govern all personal relationships. Thus, CETT Group wants to create a productive, safe, and respectful learning and working environment for everybody.

Staff and students in CETT Group are entitled to be respected. However, they also have to treat everybody they have contact with respect and contribute for everybody to be respectful.

In line with these principles, CETT Group declares that sexual orientation and other sexist or LGTBI-phobic behavior will not be permitted or tolerated under any circumstances. They must not be ignored. And they will be strongly sanctioned.

To meet these goals:

- CETT Group is asking staff and students, and especially those with authority over others, to assume responsibility by:
- Preventing actions, behavior, or attitudes of a sexual nature, with sexual innuendo or carried out because of a person's gender, which can turn offensive, humiliating, degrading, hostile, or threatening for a person.
- Acting accordingly and with empathy when addressing unacceptable behavior or situations, following the guidelines described in this Handbook; such cases will not be ignored or tolerated, and they will not be repeated or become more serious; such positions will be acknowledged; support from adequate people will be sought, and those who might be suffering harassment will be supported.



CETT Group is committed to:

- Sharing the guidelines and providing Group members -particularly managing team members - with opportunities for information and training to raise awareness around this issue and let everybody know about their rights, obligations, and responsibilities.
- Giving support and specific assistance to those who might be suffering harassment by appointing people with relevant skills to provide such support and help.
- Describing and making public the main channels for solving these issues.
- Ensuring that all complaints will be handled rigorously, with fairness, swiftly, and with confidentiality.
- Ensuring that there will be no retaliation against a complainant or against those who might be directly or indirectly involved in a formal complaint.

This Handbook (or protocol) describes the commitments mentioned above.

1. AREA OF APPLICATION AND PROTECTION	5
2. SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY SEXUAL ORIENTATION AND OTHER SEXIST OR LGTBI-PHOBIC CONDUCT	
2.1. TYPES OF HARASSMENT	7
2.2. EFFECTS OF SEXUAL HARASSMENT	7
3. RIGHTS, OBLIGATIONS, AND RESPONSIBILITY	
3.1. CETT GROUP MANAGEMENT TEAM	8
3.2. LEGAL REPRESENTATION OF EMPLOYEES	8
3.3. STAFF, STUDENTS, AND RESIDENTS	9
3.4. PRACTICAL GUIDANCE FOR PEOPLE WHO BELIEVE THEY ARE EXPERIENCING SEXUAL HARASSMENT, SEXUAL HARASSMENT, GENDER IDENTITY HARASSMENT, SEXUAL ORIENTATION HARASSMENT AND OTHER SEXIST OR LGTBI-PHOBIC BEHAVIOUR	9
3.5. PRACTICAL GUIDELINES FOR WITNESSES OF A SITUATION OF SEXUAL HARASSMENT AND THE LIKE	9
4. CHANNELS CHANNELS TO ADDRESS AND SOLVE A CASE OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY, OR SEXUAL ORIENTATION AND OTHER SEXIST OR LGTBI-PHOBIC BEHAVIOURS	10
4.1. PROCEDURE 1: MAKE A COMPLAINT AND ASK FOR HELP TO ADDRESS THE ISSUE	10
4.2. PROCEDURE 2: INTERNAL COMPLAINT AND INQUIRY	11
4.3. PROCEDURE GUARANTEES AND DEADLINES	13
4.4. SANCTIONS AND DISCIPLINARY MEASURES	13
4.5. . LEGAL PROVISIONS	14
4.6. INFORMATION	14

1. AREA OF APPLICATION AND PROTECTION

The guidelines and regulations described in the Handbook apply to all staff, students, residents, and those who might be involved with CETT Group because of their professional activity.

Sexual harassment, harassment based on sex, gender identity, sexual orientation and other sexist or LGBTBI or LGBTBI-phobic behaviour can occur in any place or at any time when people are together for professional, work or educational reasons (this includes trips, trainings days, meetings or social events, etc) harassment will not be tolerated in any of these places or circumstances.

-
- **a)** Students, both on official courses (undergraduate, master's, and doctoral degrees) and on their own qualifications, and other courses organized by the CETT, including international mobility students.
-
- **b)** Teaching and research staff, including researchers in training.
-
- **c)** Administrative and support staff of the entire CETT group or who provide services at CETT group facilities.
-
- **d)** Employees of the Alimara Hotel and the Àgora Student Residence.
-

The above- mentioned situations of harassment where the link or relationship between people is established because of their job or profession are considered to be workd-related.

This protocol will apply to denouncing, reporting, and proposing sanctions in the event of sexual harassment and harassment based on sex, gender identity, sexual orientation, and other sexist beha-

viour that occurs in the university environment by any member of the university community, regardless of their relationship with the Group, and in particular:

Sexual harassment may occur in situations where people might meet for professional, work-related, or academic reasons (such situations include work trips, training sessions, meetings, social events, etc).

Situations of sexual harassment and gender-based harassment in which the link or relationship between people is established because of their job or profession are considered work-related. In addition to the usual academic and professional activity, they also include:

-
- **a)** Academic activities carried out outside school hours or outside school premises.
-
- **b)** Curricular and extra-curricular internships carried out by students but arranged or supervised by the teaching units.
-
- **c)** Leisure activities such as end-of-career trips, university festivals, or other types of activities linked to university life if they are organized, coordinated, or supervised by academic bodies of the University.
-
- **d)** Performances by artistic or sports groups in events organized by the school.
-
- **e)** Events, fairs, and conferences held at CETT facilities and outside the premises but supervised by the school.
-

2. SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY SEXUAL ORIENTATION AND OTHER SEXIST OR LGTBI-PHOBIC CONDUCT

Sexual harassment can take place when verbal or non-verbal or physical unwanted sexual advances are aimed at infringing a person's human dignity; it may also entail the creation of a threatening, hostile, degrading, humiliating, and offensive environment (Directive 2006/54/CE).

The following behavior, solely or accompanied by other types of behavior, whether it might be isolated or sustained in time, can be considered examples of sexual harassment:

Verbal:

- Lewd comments
- Sexual or offensive jokes
- Using degrading or obscene language to address a person
- Spread rumors about the sex life of a person.
- Spread rumors about alleged sexual relationships between peers (work colleagues, students, or residents)
- Make lewd or offensive comments about a person's physical appearance.
- Talk about one's sexual prowess.
- Ask questions about sexual preferences and tell sexual fantasies.
- Insist and persist in inviting someone to a social event, although the requested person has clearly stated such proposals are unwelcome and inappropriate.
- Insist on making appointments for sexual encounters.
- Ask for sexual favors.

Non verbal:

- Eyeing someone up, ogling someone.
- Lewd gestures.
- Use of images, cartoons, drawings, photographs, and internet images with explicit sexual content.

- Letters, notes, and e-mails of an offensive sexual nature.

Physical:

- Excessive physical closeness.
- Corner someone deliberately to be alone with when it is not necessary
- Unwanted and unsolicited physical contact (pinching, touching, unwanted massages...)
- "Accidentally" or intentionally touching erogenous body parts.

Harassment based on sex, gender, identity, sexual orientation and other sexist or LGTBI-phobic behaviour is defined as situations in which unwanted behaviour is defined as situations in which unwanted behaviour related to a person's sex occurs, with the purpose or effect of violating a person's dignity and creating and intimidating, hostile, degrading, humiliating or offensive environment.

Behaviour susceptible to this type of harassment includes but is not limited to.

- Discriminatory behaviour for being a woman or man or on the grounds of sexual orientation (LGTBI) or gender identity.
- Ridicule or belittle another person's abilities for work or their skills or cognitive potential.
- Sexist humor.
- Offend people who do jobs traditionally done by another sex (for example, men nurses).
- Ignore contributions, comments, or actions done by another person based on their sex (excluding or not considering the person).

Sexual harassment and gender-based harassment will not be tolerated in these spaces or circumstances.

2.1. TYPES OF HARASSMENT

Quid pro quo harassment

People are harassed because they are coerced to choose between specific sexual demands or risk losing certain work conditions (sexual blackmailing or sextortion becomes a reality).

In these situations, the harassed person's refusal is used against them, and they are denied access to training, promotion, pay raises, or other work-related decisions.

This type of harassment implies an abuse of authority. This is because the harassers are typically people with authority and the power to make decisions in the work environment, that is, any hierarchically higher person or managerial staff.

Hostile work environment sexual harassment

It is the behaviour that creates an intimidating, hostile, or offensive environment: comments or a sexual nature, jokes, derogatory remarks about the LGBTBI collective, etc. It usually requires insistence and repeated action. It is usually produced by work colleagues or third parties related in some way to the company.

We can identify different types of harassment depending on the rapport between the victim and the perpetrator:

Lateral or peer-to-peer harassment: between co-workers

Descending Vertical harassment: supervisor-employee

Ascending vertical harassment: employee-supervisor

2.2. EFFECTS OF SEXUAL HARASSMENT

The victim usually reports the following effects:

Mental:

- Anxiety, fear, and constantly feeling threatened.
- Feeling insecure, which may result in feeling like a failure, frustrated, powerless, etc.
- Feeling vulnerable.
- Feeling defenseless.
- Feeling guilty.
- Difficulties focusing.
- Sadness.
- Stress.
- Bouts of depression.

Physical:

- Functional or organic health issues (sleep deprivation or insomnia, tachycardia, headaches, migraines, digestive issues, skin problems, etc.)

Professional:

- Demotivation and dissatisfaction.
- Loss of promotion opportunities.
- Associating work with a hostile environment that causes distress.
- Increase in absenteeism.
- Job changes.

3. RIGHTS, OBLIGATIONS, AND RESPONSIBILITY

3.1. CETT GROUP MANAGEMENT TEAM

The Management Team's obligation is to prevent sexual harassment, harassment based on sex, gender identity, or sexual orientation and other sexist or LGBTI-phobic behavior.

Legal obligations:

- Encourage equal treatment and equality of opportunities in the workplace and stop employee discrimination.
- Adopt measures aimed at avoiding any type of workplace discrimination between women, men, and TRANS people. These measures must be negotiated and, where appropriate, agreed with the legal representation of workers according to labor legislation.
- Promote work conditions, as well as training for workers, to prevent sexual harassment, harassment based on sex, gender identity, sexual orientation and other sexist or LGBTI-phobic behavior.
- To establish specific procedures for this type of harassment and to channel the complaints or claims that may be made by those who have been experienced it.
- Protect employees from occupational risks.
- The prevention of occupational risks evaluated and carried out by competent experts may include psychosocial risk studies and could include the identification and prevention of this type of harassment.

Other obligations and guidelines for the management team and staff with supervising/managing responsibilities.

- Everybody will be treated courteously and respectfully. Situations where someone may feel

offended, discriminated against, or intimidated, will be avoided.

- Ensure that the present guidelines are applied and followed accordingly.
- Look out for signs of this type of harassment.
- Facilitate the filing of complaints following the established channels.
- Respond adequately to anybody who may file a complaint
- Inform or investigate complaints rigorously.
- After a complaint has been filed, follow the situation up.
- Maintain confidentiality of the cases.

3.2. LEGAL REPRESENTATION OF EMPLOYEES

Protecting employees from sexual harassment on the grounds of sex is one of the functions of employee representatives.

The Ley Orgánica 3/2007 gives employees representatives a key role in prevention and raising awareness:

However, in the implementation of Law 4/2023, of February 28, for the real and effective equality of trans people and for the guarantee of the rights of LGBTI people, they must actively participate in their development in the company. This Law aims to develop and guarantee the rights of lesbian, gay, bisexual, trans and intersex (LGTBI) people, eradicating situations of discrimination, to ensure that sexual orientation, sexual identity, gender expression and sexual characteristics can be lived in freedom.

3.3. STAFF, STUDENTS, AND RESIDENTS

Their rights and responsibilities are the following: they have the right to a healthy work and academic environment and not to be sexually harassed or harassed on the grounds of sex.

- They must treat others with respect.
- They must not ignore inappropriate situations.
- They must inform of situations of sexual harassment or harassment on the grounds of sex they may know of.
- They must cooperate in the inquiry of an internal complaint.
- They must cooperate in the inquiry of an internal complaint of this type of harassment.
- They must agree to maintain confidentiality.

3.4. PRACTICAL GUIDANCE FOR PEOPLE WHO BELIEVE THEY ARE EXPERIENCING SEXUAL HARASSMENT, SEXUAL HARASSMENT, GENDER IDENTITY HARASSMENT, SEXUAL ORIENTATION HARASSMENT AND OTHER SEXIST OR LGTBI- PHOBIC BEHAVIOUR

CETT group would like to insist that situations of harassment will not be tolerated under any circumstances and pledges to support people who may be affected by inappropriate behavior.

If you think you have been harassed or intimidated by anybody you have contact with because of your job or studies –peers, supervisors, customers, suppliers, here, you will find a list of practical steps to know what to do.

-
- Reject advances, situations, or behavior that may be deemed offensive as clearly as possible and ask the perpetrator not to repeat the situation.
 - Keep a log or register of sexual harassment or harassment based on sex as well as the other situations.
 - Ask for help.
 - Gather information regarding all available options to complain within the company's structure (internal complaint, report) or the available legal channels.

3.5. PRACTICAL GUIDELINES FOR WITNESSES OF A SITUATION OF SEXUAL HARASSMENT AND THE LIKE

If you witness a situation where a peer or another person misbehaves towards another person, or if you think someone near you might be suffering, we kindly ask you not to look away. This section will provide you with practical steps to know what to do.

Anybody who is potentially affected by sexual harassment, harassment based on sex, gender identity, sexual orientation or other sexist or LGTBI-phobic behavior can and should report it, without necessarily being the direct object of this behavior.

-
- Tell the perpetrator that their behavior is not acceptable.
 - Support the victim.
 - Inform of the situation following the steps described in this Handbook.

4. CHANNELS TO ADDRESS AND SOLVE A CASE OF SEXUAL HARASSMENT, HARASSMENT BASED ON SEX, GENDER IDENTITY, OR SEXUAL ORIENTATION AND OTHER SEXIST OR LGTBI-PHOBIC BEHAVIOURS

Several channels exist to solve, protect and react to these situations.

People who consider that they are suffering sexual harassment or harassment based on sex and the like have different ways to address and resolve this problem:

Tackle the issue directly with the perpetrator: direct action

If you are suffering sexual harassment, it is advised that you try, in the first place, to speak to the perpetrator, clearly rejecting their -written or spoken- advances, situations, and behavior that may be deemed offensive.

Use internal channels of protection and resolution: canal ético.

We can distinguish two different types of procedures depending on the purpose.

People who think they might be suffering sexual harassment or harassment based on sex, gender identity, or sexual orientation and other sexist or LGTBI- phobic behaviors can:

I.- Make a complaint and ask for help from the company to address the issue.

II.- File an internal complaint and request the company to launch an inquiry that can result in a sanction application if needed.

4.1. PROCEDURE 1: MAKE A COMPLAINT AND ASK FOR HELP TO ADDRESS THE ISSUE

This Handbook will tell you how to file a complaint and ask for help. Your complaint will have to be processed through the Canal Ético:

canaletic@cett.cat

Telephone: 93 428 0777 ext. 7357

The Canal Ético is available for CETT staff and for people or organizations that have to do with the CETT group. It can inform the Legal Compliance Committee (also known as CETT Group Compliance Committee -to be referred to as the Committee) of any illegal or inappropriate behavior. The Committee's actions aim at preventing illegal or improper conduct from happening.

The Committee is also available for queries regarding this matter.

After a complaint has been made, the Committee will strive to solve the problem by shedding light on the facts and informing the perpetrator that their behavior contradicts the Group's principles and the consequences such behavior may carry.

This channel may only be adequate for some cases (in fact, it is not in cases whose seriousness requires disciplinary sanctions).

The Committee will act following the steps described in the Regulations in the Canal Ético. The person who thinks is suffering sexual harassment or harassment on the grounds of sex will be interviewed to:

- Obtain an initial overview of the case (identify the origin of the conflict and assess the risk the claimant may be exposed to).
- Inform and give assistance about rights, possibilities, and actions that can be taken.

The Committee will try to solve a conflict by acting as an informal mediator between parties. Likewise, the Committee will be able to extend the number of support members to carry out the inquiry and, therefore, can ask for assistance from work colleagues, students, residents, supervisors, etc. This means that the Committee will:

- Inform the perpetrator that their behavior contradicts the company's code.
- Inform the perpetrator of the possible consequences that may occur if their inappropriate behavior persists.
- Tell the perpetrator that although this first contact is informal and strictly confidential, there will be a follow-up.

The Committee will appoint a representative to participate in all this procedure's steps.

Solving a situation of sexual harassment or harassment on the grounds of sex means that:

- It can be guaranteed that such harassment is over.
- Both the perpetrator and the complainant will be informed, in writing, of the succession of events and of how the issue has been solved.

In all cases, the Committee must ensure that:

- The situation of sexual harassment or on the grounds of sex is over.
- Measures are being taken to prevent other situations of sexual harassment or harassment on the grounds of sex.
- Support is provided to the victim to help them overcome the effects of the harassment.
- Records are kept.

After filing a complaint, there will be a maximum of 15 working days to start solving the problem.

4.2. PROCEDURE 2: INTERNAL COMPLAINT AND ENQUIRY

When it is not recommended to solve the issue via mediation because of its seriousness, or when mediation attempts are rejected or fail to give a satisfactory solution, it will be obligatory to file an internal complaint and a request to launch an inquiry.

The complaint and request must be filed through the Canal Ético: **canaletic@cett.cat**

4.2.1. Features of the procedure:

The internal inquiry consists of filing an internal complaint and requesting the opening of an investigation process. The main objective will be to find out if the alleged perpetrator has infringed the company's codes and for the company to respond accordingly.

4.2.2. Estadi inicial: presentar una denúncia interna

The first step in this procedure is to inform of the facts.

An internal complaint must be filed in written form and must have the following parts:

- Name and surname of the complainant.
- Name and position of the alleged perpetrator.
- Details of relevant facts: description of places, dates, and frequency of the facts.
- Names and surnames of possible witnesses.



The Committee will have to:

- Inform the alleged perpetrator of the content of the complaint.
- Establish the terms of the inquiry. The Committee will appoint a person in charge of instructing the investigation and may enlist further people to help with the inquiry; such people may be work colleagues, students, supervisors, etc.
- Inform the alleged perpetrator and complainant who will lead the inquiry and how the investigation will be carried out.
- Inform, if necessary, workers' representatives.

4.2.3. Inquiry instruction:

The person or persons in charge of leading the inquiry will have to draw up a report stating the evidence that may confirm there has been a situation of sexual harassment or harassment on the grounds of sex.

It will be necessary to:

- Interview the complainant (a person of trust or colleague can accompany the complainant).
- Interview possible witnesses (and inform them of the need for confidentiality throughout the process).
- Interview the accused person/defendant (who can be accompanied throughout the process by a person of trust or colleague).

If necessary, the assistance of experts in psychology, law, medicine, etc., can be sought. The complainant only must provide evidence of discriminatory actions. The defendant will have to prove the absence of discrimination.

The inquiry will finish with a decision, and its report will include a summary of the facts. The inquiry report will also have a list of people interviewed, questions asked, and the conclusions reached by the investigators.

4.2.4. Provisional measures during the inquiry:

During the inquiry, it will have to be decided if it is necessary to:

- Take measures to limit or avoid contact between the complainant and the alleged harasser.
- Reduce the opportunities for contact between parties during the inquiry.
- Provide support and assistance.
- Take measures to guarantee confidentiality.

4.2.5. Decision making: resolution

The person or persons responsible for leading the inquiry will have to draw up a report which must identify sufficient evidence to confirm there has been sexual harassment or harassment on the grounds of sex.

If sexual harassment or harassment on the grounds of sex is proven, the following will be decided:

- Sanctions or other measures.
- Compensation for the person who has suffered sexual harassment or harassment on the grounds of sex.

4.2.6. Inform of the inquiry's result and the right to appeal.

The person or persons responsible for solving the issue will inform the complainant of the disciplinary measures to take. Finally, the resolution will summarize the findings and describe relevant compensations and sanctions.

4.3. PROCEDURE GUARANTEES AND DEADLINES

All complaints will be treated rigorously, swiftly, impartially, and with the utmost confidentiality.

Everyone involved must preserve confidentiality throughout the inquiry and proceed with impartiality and celerity. All the information regarding complaints about sexual harassment or harassment on the grounds of sex will be treated, protecting all the people's right to privacy.

The complainant has the right to:

- Have their complaint dealt with swiftly.
- Be accompanied by a person of trust throughout the inquiry.
- Be assured that there will be no complaint registration in the personal records if the complaint was made in good faith.
- Be informed of the progress of the inquiry.
- Be informed of the measures taken.
- Be treated with fairness.

The person accused of sexual harassment or harassment on the grounds of sex, gender identity, or sexual orientation and other sexist or LGT-BI-phobic behavior has the right to

- Be informed of the complaint and inquiry.
- Receive a copy of the formal complaint and give their answer to it.
- Be accompanied by a person of trust throughout the inquiry.
- Be informed of the progress of the inquiry.
- Be treated with fairness.

-
- **This process must be at most seven working days.**

4.4. SANCTIONS AND DISCIPLINARY MEASURES

Sexual harassment or harassment based on sex, gender identity, or sexual orientation and other sexist or LGTBI-phobic behavior are explicitly prohibited by this protocol and will be treated as a disciplinary infraction.

- Quid pro quo harassment will be considered a serious offense.
- Sexual harassment in the workplace or harassment on the grounds of sex will be considered a serious or very serious offense depending on the circumstances of the case.

Retaliation against a person who has complained of sexual harassment or harassment based on sex and the like, or against someone who has collaborated in an inquiry constitutes a serious disciplinary infraction.

The Committee will hand the inquiry report to General Management. General Management will study what measures to take for cases concerning staff, and Heads of School and School co-coordinators will do the same for cases concerning students. The authorities will be contacted if the situation involves people who are not members of staff or students.

When staff is involved, disciplinary measures and sanctions are described in the appropriate collective labor agreement. In the case of students, these are found in the student's and residents' code of conduct.

We will inform all our stakeholders of our harassment protocol so that they comply with it.



4.5. LEGAL PROVISIONS

There are additional channels to solve or address a situation of sexual harassment or harassment on the grounds of sex, to those described in paragraph 3 of this Handbook. These are legal provisions that provide further protection to the victims of harassment. These are some of the most common provisions:

4.5.1. Annulment of acts or provisions which are discriminatory on the grounds of sex

Article 10 on the 22nd of March Spanish Ley Orgánica 3/2007 for the effective equality between men and women states:

“Acts or provisions of legal transactions that constitute or cause discrimination on the grounds of sex will be annulled and without effect and will lead to taking responsibility through a compensation system that will be real, effective and proportionate to the damage suffered; it will also lead to creating an effective sanctioning and dissuasive system that can stop discriminatory situations from happening.”

4.5.2. Effective judicial protection

In addition to the internal measures carried out by CETT Group, the complainants can ask for adequate judicial protection from courts. They will also be able to claim equality between men and women according to the Spanish Constitution article 53.2. Likewise, the complainant will be the only person entitled to locus standi (the entitlement to bring further legal proceedings) in sexual harassment or harassment on the grounds of sex court cases (Art. 12 22nd March Ley Orgánica 3/2007, for the effective equality between men and women).

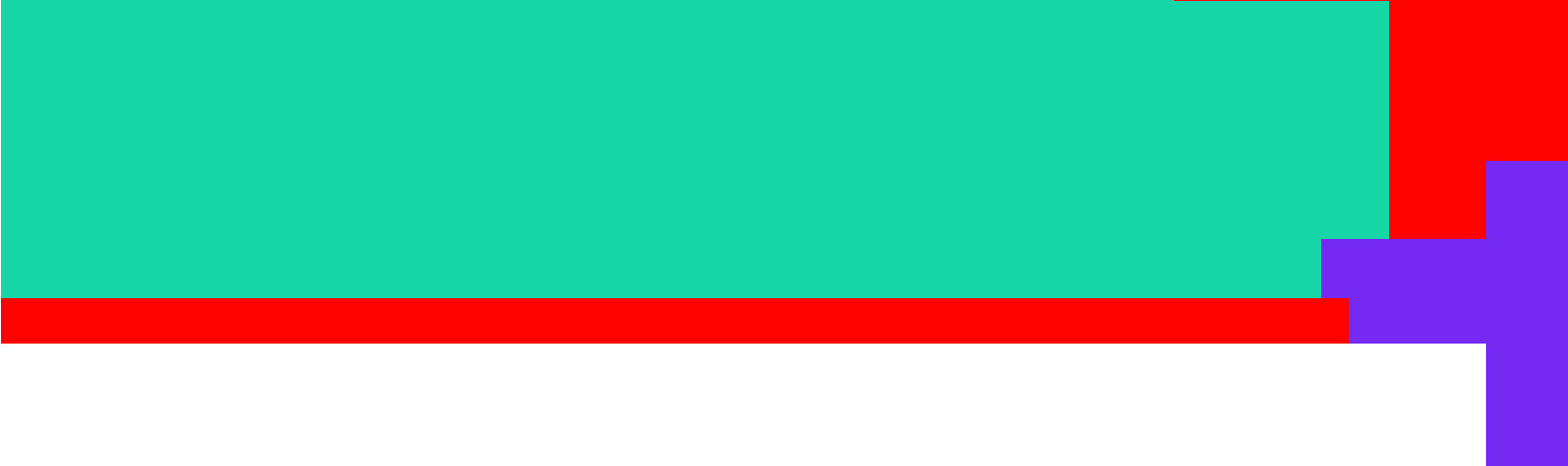
In all court cases, if the complainant can substantiate their allegations of discrimination on the grounds of sex, it is down to the defendant to prove the absence of discrimination.

4.6. INFORMATION

CETT Group is committed to disseminating the Handbook and creating opportunities to inform and train all its members, particularly its management team, to raise awareness around this issue and share knowledge of everybody's rights, duties, and responsibilities.

CETT Group guarantees that:

- The Handbook and especially the guidelines for people who might be suffering sexual harassment will be available to all members of staff, students, and residents.
- These guidelines must also be made known to the collaborating companies, suppliers, and service providers, the companies, or organizations in which the students carry out external work experience, and to the institutions to which CETT staff are linked and affiliated, stating that it must be strictly complied with.
- It will include a training day for academic staff at the Graduate School and employees of the CETT Group on harassment and sexist behavior and the protocol application.
- At the beginning of each academic year and during the incorporation of a new employee in the CETT Group, this protocol is included in the welcome plan, informing and forming part of the internal policies of the CETT Group.



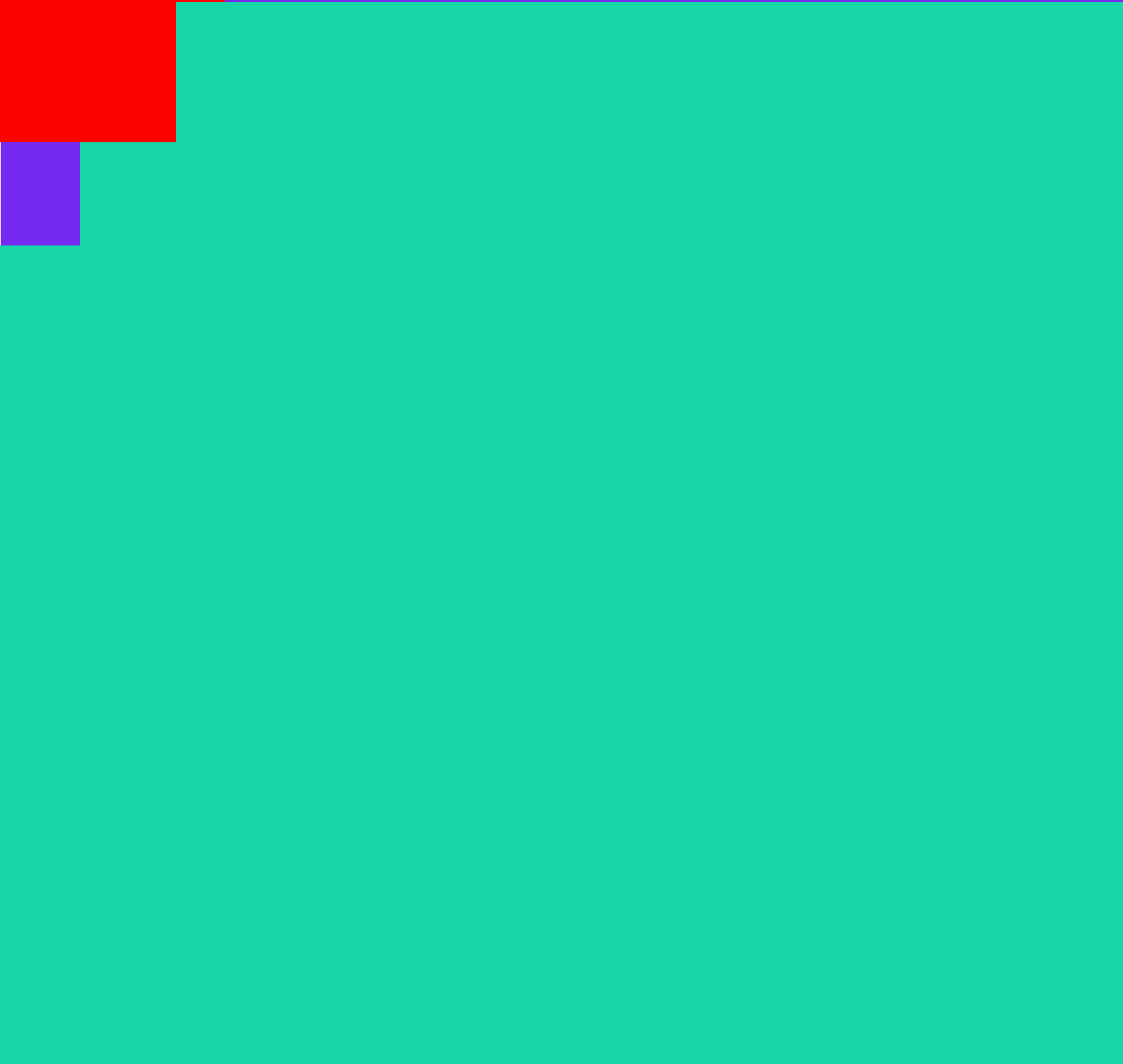
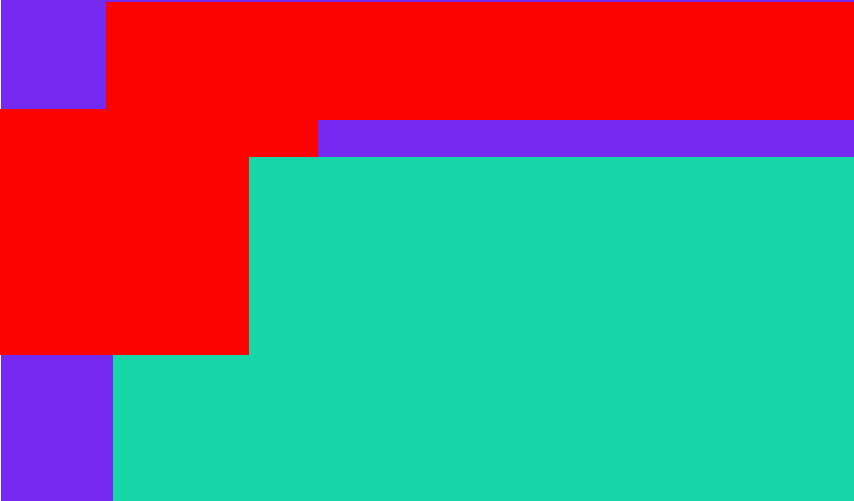
CETT Group will organize specific training sessions about:

- What is and what is not sexual harassment or harassment based on sex?
- Policies to prevent sexual harassment or harassment on the grounds of sex.
- Channels for resolution.

Barcelona, April 2019

Reviewed on April 2023

Reviewed on July 2024



Barcelona School
of Tourism, Hospitality
and Gastronomy

