



Standard Operating Procedure for the Prevention and Response to Sexual Harassment in the Civil Service

Endorsed by 44th Commission Meeting, held on May 13, 2025

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1. Background

Article 9, Section 17 of the Constitution of the Kingdom of Bhutan mandates the elimination of all forms of discrimination and exploitation against women, including violence, harassment and intimidation in workplaces across both public and private sectors. This constitutional provision underscores the importance of fostering a safe and respectful work environment for all employees.

The Penal Code of Bhutan reinforces this definition by stating that an individual is guilty of sexual harassment if they engage in unwelcome physical, verbal, or non-verbal abuse of a sexual nature. Specifically, Sections 205 and 206 of the Penal Code address sexual harassment, with the latter classifying the offense as a petty misdemeanor. Furthermore, the Civil Service Act of Bhutan 2010, Section 38 (g), explicitly states that a civil servant shall not engage in sexual harassment. This is reiterated in the Bhutan Civil Service Rules and Regulations, 2023, Section 3.3.18, which defines sexual harassment as "an unwelcome verbal, visual, or physical conduct of a sexual nature that affects working conditions or creates a hostile work environment.

Despite this legal framework, sexual harassment remains a pervasive issue that undermines workplace harmony, mental health, and productivity. Understanding and addressing sexual harassment is essential for building inclusive workplaces that uphold dignity and equality. Organizations must adopt comprehensive policies to prevent harassment, support victims, and ensure accountability while fostering a culture of mutual respect.

Recognizing the importance of this issue, the Royal Civil Service Commission (RCSC) instituted the Go-To Person program in 2018 aimed to create safer, confidential and more supportive workplaces by designating individuals to provide psychological first aid, emotional support, guidance on procedures, and referral support to colleagues experiencing distress or workplace challenges. However, in the absence of a clear operational framework, inconsistencies in implementation, lack of awareness, and limited accountability have hindered the program's effectiveness. Additionally, the National Commission for Women and Children (NCWC) mandates all government entities to implement mechanisms to address gender-related concerns as part of their Annual Performance Agreements.

Therefore, to strengthen the function of the *Go-To Person* and bridge these gaps, this Standard Operating Procedure (SOP) is formulated in accordance with these national legal provisions.

2. Purpose of the SOP

This SOP aims to create a safe, respectful, conducive, and inclusive work environment for all civil servants by proactively preventing and addressing incidents of sexual harassment in the workplace through systematic, clear, consistent and accountable support service, maintaining

confidentiality and trust, better legal compliances, and framework for continuous improvement.

3. Scope

- 3.1. This SOP shall cover all civil servants including ESP/GSP, volunteers, consultants, expatriates, interns, or any other individuals engaged in work-related activities with the civil service.
- 3.2. It shall extend beyond the physical location where work is typically performed. It also encompasses any setting where work-related activities occur, including work-related social events, conferences, training sessions, official business travel, and other related events.

4. Definition of Sexual Harassment:

Sexual harassment in the civil service refers to any unwelcome physical, verbal, or non-verbal conduct of a sexual nature (including technology-facilitated) that affects working conditions or creates a hostile work environment. This includes but is not limited to using position to gain sexual favours.¹

5. Principles

- 5.1. The RCSC upholds a strict zero-tolerance approach towards sexual harassment in any form to foster a safe, respectful, conducive, and inclusive work environment in Civil Service.
- 5.2. All incidents must be responded with the utmost priority, confidentiality, safety and in a non-discriminatory and timely manner to protect the privacy and safety of all parties involved, particularly the victim.
- 5.3. Sexual harassment by civil servants constitutes an act of gross misconduct and, therefore, grounds for appropriate administrative action, including termination of employment.
- 5.4. Any sexual relationship/sex with children is strictly prohibited regardless of their consent;

¹ Examples on sexual harassment cases in the annexure. The examples are not exhaustive.

- 5.5. Exchange of money, goods, or services for sex with client² is strictly prohibited;
- 5.6. All actions must minimize harm, whether physical, emotional, social, or professional, to the victim;
- 5.7. Gender responsive and inclusive approach.

6. Legal framework and Compliance

This SOP is formulated in accordance with national and international legal provisions, including but not limited to:

- 6.1. Constitution of the Kingdom of Bhutan 2008 - Article 9 (17)
 - 6.1.1. *“The State shall endeavour to take appropriate measures to eliminate all forms of discrimination and exploitation against women including trafficking, prostitution, abuse, violence, harassment and intimidation at work in both public and private spheres.”*
- 6.2. Penal Code of Bhutan - Sections 205 and 206
 - 6.2.1. *Sexual Harassment: “a defendant shall be guilty of sexual harassment, if the defendant makes unwelcome physical, verbal or non-verbal abuse of sexual nature”*
 - 6.2.2. *Grading of Sexual Harassment: “the offence of sexual harassment is a petty misdemeanor”*
- 6.3. Civil Service Act of Bhutan 2010 - Section 38 (g)
 - 6.3.1. *A civil servant shall not engage in sexual harassment.*
- 6.4. Bhutan Civil Service Rules and Regulations, 2023- Section 3.3.18
 - 6.4.1. *A civil servant shall not engage in sexual harassment. Sexual harassment means an “unwelcome verbal, visual, or physical conduct of a sexual nature that affects working conditions or creates a hostile work environment”.*

² individuals who are receiving services or assistance from the civil service or individuals working with the civil service.

7. Responsibilities of relevant institutions and individuals

7.1. Responsibilities of RCSC

The RCSC shall:

- 7.1.1. Uphold a strict zero-tolerance approach towards sexual harassment in any form to foster a safe, respectful, conducive, and inclusive work environment in Civil Service.
- 7.1.2. Ensure transparency in its efforts to support victims and improve the work environment.
- 7.1.3. Ensure that the SOP is widely disseminated among the Civil Service.
- 7.1.4. Coordinate with relevant agency and build capacity of the Go-To Person and relevant officials to effectively prevent and respond to sexual harassment.
- 7.1.5. Ensure the effective implementation of the SOP including establishment of system/mechanism to prevent and respond to Sexual Harassment.
- 7.1.6. Maintain information/data on sexual harassment incidents in a confidential manner within the Civil Service and disseminate the number through the annual report. RCSC shall share the information with NCWC annually and as and when required.
- 7.1.7. Review and update the SOP as deemed necessary.

7.2. Responsibilities of Head of Agencies³

The Heads of Agencies shall:

- 7.2.1. Be responsible for providing employees with accessible reporting mechanisms for incidents of sexual harassment.
- 7.2.2. Demonstrate commitment to uphold the principle of zero tolerance to sexual harassment and create a respectful work culture.
- 7.2.3. Demonstrate commitment to protect the person reporting incidents of sexual harassment, participating in the enquiry process or supporting the

³ Head of Agency refers to head of Ministries, autonomous agencies, local government, constitutional bodies

victim from retaliation from the harasser or others.

- 7.2.4. Ensure that a comprehensive and appropriate internal redressal mechanism is in place to prevent and respond to sexual harassment.
- 7.2.5. Institute/designate a committee responsible for preventing and responding to sexual harassment. They may further delegate this responsibility to heads of Departments, regional offices, institutions, centres, schools etc. as deemed necessary.
- 7.2.6. Appoint/designate “Go-To Person” and alternate Go-To Person. The alternate Go To Person should be of opposite gender to the Primary Go To Person. The Heads of Agency may further delegate responsibility to appoint/designate relevant officials as the representatives of Go To Person to the heads of regional offices, institutions, schools etc as deemed necessary
- 7.2.7. Ensure all employees are made aware of sexual harassment, Civil Service policy on addressing sexual harassment, and redressal mechanisms including the identity and role of Go To Person.
- 7.2.8. Support capacity building of Committee, “Go-To Person” and alternate focal with support from/in coordination with RCSC and relevant agencies
- 7.2.9. Ensure that data/information on sexual harassment incidents and measure taken are compiled in a confidential manner and share the number with RCSC annually or as and when required
- 7.2.10. Submit an annual Certification and Action Taken (CAT) report by December 31 to the Wellbeing Services, RCSC.
- 7.2.11. Ensure that the role of Go To Person and alternate Go To Person is appropriately reflected/ recorded in the Performance Dashboard.

7.3. Responsibilities of the Committee⁴

The committee shall:

- 7.3.1. Support the “Go-To Person” to implement interventions to prevent sexual harassment within the respective agencies including training and

⁴ The HRC, Management Committee or any other committee instituted /designated to prevent and respond to sexual harassment within respective agencies

sensitization on sexual harassment, redressal mechanisms and relevant policies

- 7.3.2. Respond to sexual harassment complaints through a fair, confidential, and timely process, and provide appropriate support services.
- 7.3.3. Take appropriate actions against sexual harassment incidents reported to the committee.
- 7.3.4. Review agencies' intervention to address sexual harassment and make appropriate recommendations.

7.4. Responsibility of the Go-To Person

The Go-To Person⁵ or designated representative shall be focal point to spearhead initiatives to prevent and/or address sexual harassment within the respective agencies. The Go-To Person shall:

- 7.4.1. Coordinate and support functioning of the Committee
- 7.4.2. Create awareness on prevention of sexual harassment including dissemination of this SOP to all employees⁶ within the agencies. The Go To Person may seek support from the gender and child focal person/interim protection officer
- 7.4.3. Support the victims with appropriate services including facilitating reporting of incidents with informed consent.
- 7.4.4. Maintain data on reported incidents of sexual harassment and measures taken.
- 7.4.5. Prepare an annual Certification and Action Taken (CAT) report for review and certification by the Head of Agency.
- 7.4.6. Prepare updates on reported sexual harassment incidents, implementation progress of the SOP and all other relevant information update and ensure proper hand over in the event he/she leaves the

⁵ The Go-To Person shall be the Human Resource Officer or any other relevant officials except the Protection Officer appointed by the head of agencies based on the requirement as prescribed in this SOP

⁶ All new recruits should be made aware on the SOP and refresher sessions must be provided periodically for all employees

agency.

- 7.4.7. Follow up on status and action taken on cases referred to the relevant service providers.

7.5. Responsibilities of alternate Go-To Person

The alternate Go-To Person:

- 7.5.1. Support the Go-To Person in fulfilling the responsibilities as outlined in section 7.4 of this SOP.
- 7.5.2. Spearhead initiatives to address sexual harassment in absence of the Go-to Person.

7.6. Responsibilities of the National Commission for Women and Children

The National Commission for Women and Children shall:

- 7.6.1. Monitor the implementation and effectiveness of the SOP
- 7.6.2. Work closely with the RCSC to institutionalize the SOP as mandatory protocol within the civil service.
- 7.6.3. Prepare evidence-based reports to inform the government on the current situations, gaps, and trends related to workplace safety for all civil servants.

8. Procedure for Reporting and Responding to Sexual Harassment Incidents

8.1. Reporting

- 8.1.1. A civil servant or anyone affiliated with/working with civil servants can report incident of sexual harassment in any form of communication to:
 - 8.1.1.1. Go-To Person/alternate Go To Person
 - 8.1.1.2. Head of agency
 - 8.1.1.3. Supervisor
 - 8.1.1.4. RCSC
 - 8.1.1.5. Relevant service providers
 - 8.1.1.6. Royal Bhutan Police

- 8.1.2. In case, the complainant⁷ feels threatened, anonymous reporting can be made to the Go-To Person or through other forms. The Go To Person shall prepare a report upon review of these complaints and present to the Committee and head of agency for corrective actions.
- 8.1.3. Any individual other than the victim can also lodge the complaint on behalf of the victim with informed consent from the victim.

8.2. Redressal Mechanism

- 8.2.1. The Head of Agency, Supervisors or any other employees shall refer incidents of sexual harassment to the Go-To Person with informed consent. In cases where the complaint is against the Go-To Person or if the victim is not comfortable to be referred to the Go To Person or where conflict of interest may arise, the case shall be referred to the alternate Go-To Person.
- 8.2.2. The Go-To Person upon receiving the reports of sexual harassment shall:
 - 8.2.2.1. Provide first line support services including psychological first aid and facilitate provision of immediate assistance (medical, shelter, protection etc..) to the victim with consent from the victim and in collaboration with relevant service providers, if required (*refer to the roles of front line workers in the annex*).
 - 8.2.2.2. Inform the parent/caregiver immediately if the victim is a child and refer the incident to the relevant service providers.
 - 8.2.2.3. Explain to victims of the various reporting options, procedures, services available and potential consequences or outcomes of each choice.
 - 8.2.2.4. Inform the head of the agency immediately with consent from the victim. However, in the event the head of the agency is alleged, the Go-To Person shall forward the case to the Civil Service Support Desk, Royal Civil Service Commission
 - 8.2.2.5. The Go-To Person shall forward the case to relevant case management service providers (example: The PEMA Secretariat, RENEW, Nazhoen Lamtoen in case of child) or Royal Bhutan Police

⁷ Complainant can be the victim or third party

in consultation and with consent from the victim. At the same time, the Go-To Person shall notify the Committee without Personal Identifying Information.

8.2.2.6. In the event, the victim is not capable of providing informed consent or not in the state to take appropriate decision, the Go To Person shall facilitate reporting of the cases to Royal Bhutan Police or relevant service providers

8.2.2.7. If the complaint is of intrusive sexual nature, within the last five days, the Go To Person shall forward the incident to the Royal Bhutan Police and share information with the Committee without Personal Identifying Information.

8.2.2.8. If the victim prefers the incident not to be referred to service providers and wishes to address the complaint within the agency and is not of intrusive sexual nature, the Go-To Person shall collect required information and submit it to the Committee for necessary action.

8.2.2.8.1. The Committee upon receipt of the incident report shall constitute an enquiry team and empower the team to review.

8.2.2.8.2. The team shall undertake a fact-finding exercise and submit the findings to the Committee within three working days.

8.2.2.8.3. The Committee shall notify the alleged in writing of the enquiry team's finding and direct him/her to submit further response to the case.

8.2.2.8.4. The Committee will deliberate on the findings as well as the additional responses of the alleged, and take/recommend appropriate decisions within three working days.

8.2.2.8.5. All parties involved should cooperate with the enquiry team.

8.2.2.8.6. The Committee shall notify in writing of the Committee's decision to the relevant parties.

- 8.2.2.8.7. The relevant parties may appeal against the decision of the Committee within 10 working days from the receipt of the decision to the Committee.
- 8.2.2.8.8. The Go To Person shall update information of the incident in the Zhiyog Online System
- 8.2.2.8.9. The Committee shall recommend appropriate measures to prevent and mitigate risk of sexual harassment in the future
- 8.2.2.8.10. The Go-To Person in collaboration with relevant service providers will monitor the well-being of the victims throughout the enquiry and beyond, ensuring that any ongoing support needs are addressed. This includes regular check-ins.

8.3. Post incident follow up

- 8.3.1. The Go-To Person will work with the head of agency, relevant officials and the victim to implement the Committee's decision/recommendation. This may include:
 - 8.3.1.1. Necessary adjustments to the workplace such as changes in reporting lines, work location adjustments, or leave to ensure the victim's comfort and safety.
 - 8.3.1.2. Coordinate and support in the healing process of employees
 - 8.3.1.3. Further creating awareness and building capacities
 - 8.3.1.4. Strengthening the reporting and response mechanism

8.4. Protection against Retaliation

- 8.4.1. Retaliation refers to any direct or indirect detrimental action recommended, threatened or taken because an individual reported sexual harassment in good faith or cooperated with an authorized fact-finding activity.
- 8.4.2. All employees have responsibility to report sexual harassment and to cooperate fully with any authorized fact-finding activity.

8.4.3. This SOP shall protect all individuals who participate in a complaint process under all circumstances as long as the complainant was acting in good faith.

8.4.4. It prohibits retaliation, opposition and punishment of members and third parties for asserting their rights to complain.

8.4.4.1. This SOP strictly prohibits retaliation against individuals for:

- Reporting incidents of sexual harassment;
- Receiving reports;
- Being a witness;
- Being part of an inquiry team or the Committee

8.4.5. If anyone experience retaliation for reporting Sexual harassment/taking part in enquiry process etc, he/she shall report to the Go to Person or alternate Go To Person.

8.4.6. The Go To Person shall collect necessary information and submit the complaint to Committee

8.4.7. The Committee shall review the case and provide an appropriate recommendation/decision.

8.4.8. The Committee will take appropriate measures to protect against victimization of or retaliation against complainants, victims, witnesses and whistle-blowers.

8.4.9. The Go To Person will coordinate with the head of agency and relevant officials to implement the committee's recommendation.

Annexure I: Examples of Workplace Sexual Harassment.

1. Verbal or written.

Verbal or written sexual harassment refers to unwanted, unwelcome, or inappropriate comments, gestures, or sexual innuendos whether communicated in person, through digital platforms or in writing that create a hostile, intimidating, or offensive environment for any person.

This can include but is not limited to:

- Inappropriate sexual comments about clothing, personal behaviour or a person's body
- Telling inappropriate sexual or sex-based jokes
- Sending unwanted suggestive letters, notes, emails or others
- Requesting sexual favors, making sexual innuendos or repeatedly asking someone out
- Telling lewd jokes or sharing sexual anecdotes
- Making derogatory remarks about a person's sexual orientation or gender identity,
- Spreading rumors about a person's sexuality
- Taunting or calling someone indecent names based on gender
- When a person looks or comments on someone else's body in a way that makes that person feel uncomfortable
- Asking about someone's romantic experiences

2. Physical

Physical sexual harassment refers to any unwelcome or inappropriate physical contact or behaviour of a sexual nature that makes a person feel uncomfortable, intimidated, or threatened. Some of the examples include but are not limited to;

- Inappropriate and unwanted touching of a person.
- Other inappropriate touching including kissing, hugging, patting, stroking or rubbing
- Purposefully brushing up against another person
- Standing too close to someone and speaking in an intimate way
- Blocking someone's path or standing too close in an intimidating way

3. Non-verbal

Non-verbal sexual harassment refers to unwelcome, non-physical behaviours or actions of a sexual nature that create an intimidating, hostile, or offensive environment.

Non-verbal sexual harassment includes but not limited to;

- Looking at a person's body in a sexually suggestive or offensive manner
- Whistling or staring in a sexually suggestive way
- Making offensive gestures or facial expressions of a sexual nature
- Following someone persistently, including online (cyberstalking)
- Making inappropriate sexual gestures
- Sending sexual texts, emails, or messages
- Displaying sexually suggestive images or objects
- Making gestures or facial expressions that are suggestive or offensive

4. Visual

Visual sexual harassment involves but is not limited to using visual elements such as images, videos, or gestures that are sexually explicit or suggestive, making the targeted individual feel uncomfortable or threatened.

- Displaying sexual posters, drawings, pictures or emails
- Sharing sexually inappropriate images or videos, such as pornography
- Displaying inappropriate sexual images or posters in the workplace

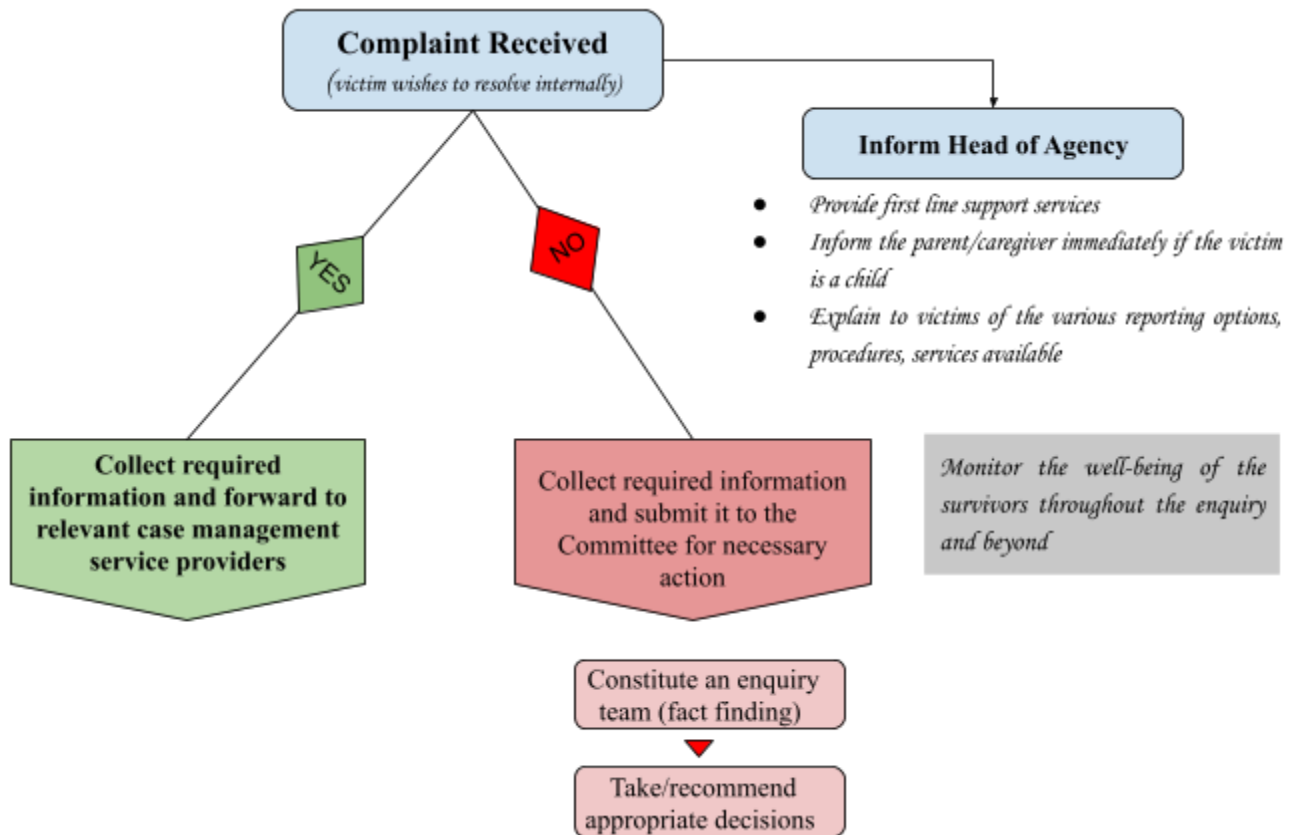
5. Hostile work environment

When ongoing behaviors (even if not directed at a specific person) create an intimidating, hostile, or offensive workplace. For example:

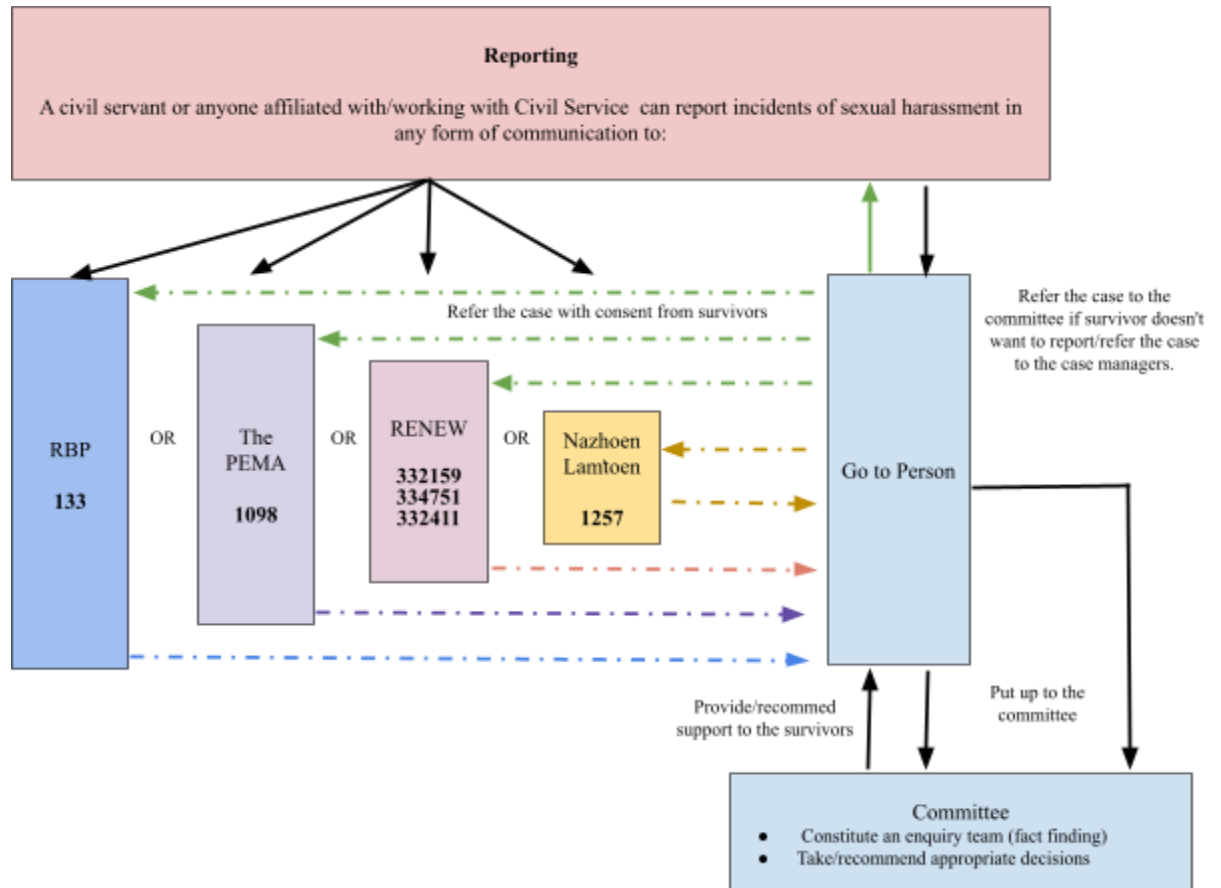
- A team culture that tolerates sexist jokes
- Managers ignoring complaints or normalizing such behavior

**** The examples listed above are intended to provide a broad understanding of the types of sexual harassment that may occur in the workplace. They are not exhaustive, and other behaviours or conduct not specifically mentioned may also constitute sexual harassment. If any employee feels unsafe or experiences behaviour that they perceive as sexual harassment, regardless of whether it matches the examples provided, it is essential to report the incident. All concerns will be taken seriously, and the organization is committed to addressing any form of harassment promptly and effectively.*

Annexure II: Process for Referral



Procedure for reporting and responding to sexual harassment incidents



Annexure III: Go-To Person Certification and Action Taken (CAT) Report

Reporting Year (YYYY)	
Submission Deadline (December 31)	
Name, EID & Designation of the Go-To Person	
Name, EID & Designation of the Alternate Go-To Person	
Agency	

Section A: Certification of Compliance

Compliance Area	Status (Yes/No)	Remarks/Explanation
Appointed a Go to Person and the Alternate Go to Person	Yes/No	
SOP on Sexual Harassment disseminated to all staff, awareness conducted on prevention of sexual harassment	Yes/No	(Indicate dates and instances)
Were there any SH cases reported in the reporting period? Number of SH cases reported, if any.	Yes/No	(Indicate number)/NA
Reported sexual harassment cases maintained with strict confidentiality	Yes/No	
Appropriate referral made for reported incidents with victim consent	Yes/No	
Victim supported with immediate and/or ongoing services and Workplace adjustments made (if required) for survivor safety and comfort	Yes/No	
Proper handover ensured (if change of Go To Person Focal)	Yes/No/ NR	

Section B: Key Challenges and Gaps

- _____
- _____
- _____

Section C: Recommendations for Future

- _____
- _____
- _____

Certification by Head of Agency

I, the undersigned, hereby certify that the information provided in this form is true and accurate to the best of my knowledge. I affirm that I have fulfilled my responsibilities as outlined in the Standard Operating Procedure on Prevention and Response to Sexual Harassment in the Civil Service.

Name: _____

Signature: _____

Date: _____

#ZeroToleranceToSexualHarassment

To be submitted to the well-being focal person in RCSC before December 31 of every year

Annexure IV: Directory of Referral Contacts for Sexual Harassment Cases

SN	Organization	Type of Support Provided	Focal Person (if available)	Email Address	Contact Number/ Toll Free Number	Remarks
1	Royal Civil Service Commission (RCSC)					
2	National Commission for Women and Children Secretariat (NCWCS)	Capacity building Awareness program Monitoring		wcdncwc@ncwc.gov.bt	02-325199	
3	The PEMA Secretariat	Psychosocial support as per the need-based assessment		rsd@thepema.gov.bt helpline@thepema.gov.bt	1098 (Helpline)	Catering as per need-based assessment with practice of trauma-informed care
4	Royal Bhutan Police (RBP)	Legal action, emergency protection		rbp.hotline@rbp.gov.bt	113 (Toll-Free)	In case of immediate danger
5	RENEW	Legal aid, shelter services, survivor counseling		info@renew.org.bt		Confidential 24/7 support
6	One-Stop Crisis Center (OSCC)	provide critical services to survivors of violence, particularly women and children.			02-323811	Health
7	Nazhoen Lamtoen	Case management Shelter			1257 (Toll free)	For Children