

To achieve Well-being in working on board ship

# A Handbook on the Prevention of Bullying and Harassment on Board Ship



The Maritime Human Resource Institute, Japan

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# GUIDANCE ON ELIMINATING SHIPBOARD HARASSMENT AND BULLYING



**INTERNATIONAL CHAMBER OF SHIPPING**



**INTERNATIONAL TRANSPORT WORKERS' FEDERATION**



# GUIDANCE ON ELIMINATING SHIPBOARD HARASSMENT AND BULLYING

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# FOREWORD

## GUY RYDER

### DIRECTOR-GENERAL OF THE INTERNATIONAL LABOUR ORGANIZATION

Under the Maritime Labour Convention, 2006, each Member State is required to satisfy itself that the provisions of its law and regulations respect the fundamental right to the elimination of discrimination in respect of employment and occupation.

Harassment and bullying on board ships can have serious consequences for the physical and emotional health of seafarers, lead to decreased motivation and increased sickness and can compromise cohesive and effective teamwork. It can also have negative effects for companies, resulting in a deterioration of working conditions and potential organisational, economic and legal consequences.

In recent years, awareness of this issue within the maritime workplace has increased and it is now of concern to all ILO Member States.

As a ship is often a seafarer's home for many months, harassment and bullying can be of concern given the shipboard living and working environment, isolation, size and proximity of cabins and the necessity to remain at the workplace during rest periods.

This guidance has been prepared by shipowners' and seafarers' organisations working together to eliminate harassment and bullying and improve the working environment on board the world's ships.

I therefore welcome the widespread dissemination of this guidance.



# INTRODUCTION

All seafarers have the right to work without suffering harassment and bullying. Unfortunately, however, there are seafarers that are victims of harassment and bullying on board ships. It is the responsibility of:

- Shipping companies to ensure that policies are in place for the elimination of all forms of harassment and bullying of seafarers on board their ships; and
- Seafarers' organisations and seafarers to ensure that harassment and bullying do not take place.

Shipping companies and seafarers' organisations are committed to producing materials to draw attention to the issues and to highlight potential actions to resolve these.

The International Chamber of Shipping (ICS) and the International Transport Workers' Federation (ITF) consider harassment and bullying to be unacceptable and have together produced the following guidance for shipping companies, seafarers and seafarers' organisations and other parties, including training providers, on what they can do to eliminate harassment and bullying. If any seafarer complains of having been the victim of harassment and/or bullying, complaints must be taken seriously and investigated.

Harassment and bullying are examples of conduct that is unwanted and causes detrimental effects, which may include:

- Stress;
- Lack of motivation;
- Reduced work performance;
- Absence from duties; and
- Resignations.

Harassment includes any inappropriate and unwelcome conduct which, whether intentionally or not, creates feelings of unease, humiliation, embarrassment or discomfort for the recipient.

Bullying is a particular form of harassment that includes hostile or vindictive behaviour, which can cause the recipient to feel threatened or intimidated.

In some cases, those committing acts of harassment and bullying do so intentionally. However, there are also actions which can be classed as harassment and/or bullying that occur unwittingly, rather than as a result of any deliberate malign intention. Hence the adoption and encouragement of management styles that do not involve aggressive and intimidating behaviours would also make an important contribution to the eradication of workplace harassment and bullying.

For companies, there are also strong legal and economic reasons for eliminating harassment and bullying:

- It is a matter of good employment practice to foster a working environment in which seafarers can work free of harassment and bullying;
- Seafarers who suffer harassment and bullying can feel demotivated and are more likely to suffer from stress leading to absence from duties;
- They are also more likely to want to leave their employment, resulting in additional recruitment expenses for the company; and
- Some employees who have suffered harassment have brought successful claims of discrimination.



# AIM OF THE GUIDANCE

## FOR SHIPPING COMPANIES

These guidelines aim to assist companies to:

- Develop policies and plans to eliminate harassment and bullying on board ships; and
- Involve its seafarers and/or seafarers' organisations in this process.

Where appropriate and taking account of national legal systems, company policies on harassment and bullying should be incorporated into collective bargaining agreements.

## FOR SEAFARERS

These guidelines aim to assist seafarers to:

- Recognise examples of harassment and/or bullying;
- Identify incidents through the use of effective grievance procedures;
- Get involved in situations where they see other seafarers being harassed and bullied in the workplace to support them when necessary;
- Avoid bullying and harassing others;
- Report if bullying and harassment is observed or experienced;
- Apply and comply with the company's policies;
- Use the company's procedures on bullying and harassment;
- Seek help and support when necessary from seafarers' organisations and other welfare bodies; and
- Appreciate the benefits of a workplace free from harassment and bullying.

# WHAT IS HARASSMENT?

Harassment is a form of discrimination which has the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

## EXAMPLES OF HARASSMENT

The following may be found to be examples of harassment:

- Displaying or circulating offensive or suggestive material;
- Innuendo, mockery, lewd or sexist/racist/homophobic jokes or remarks;
- Use of offensive language in describing or making fun of someone with a disability;
- Comments about a person's physical appearance or character which cause embarrassment or distress;
- Unwelcome attention such as spying, stalking, pestering, overly familiar behaviour or unwelcome verbal or physical attention;
- Making or sending unwanted, sexually suggestive, hostile or personally intrusive telephone calls, text messages, emails, comments on social networks, faxes or letters;
- Unwarranted, intrusive or persistent questioning about a person's age, marital status, personal life, sexual interests or orientation, or similar questions about a person's racial or ethnic origin, including their culture or religion;
- Unwelcome sexual advances or repeated requests for dates or threats;
- Suggestions that sexual favours may further a person's career, or that not offering them may adversely affect their career;
- Leering, rude gestures, touching, grabbing, patting or other unnecessary bodily contact such as brushing up against others; and
- Spreading malicious rumours, or insulting someone (particularly regarding age, race, marriage, civil partnership, pregnancy and maternity, sex, disability, sexual orientation, religion or belief, and gender reassignment).



# WHAT IS BULLYING?

Bullying is a form of harassment that includes hostile or vindictive behaviour, which can cause the recipient to feel threatened or intimidated. It results in a work environment in which a group of people or an individual may become threatened or intimidated because of the negative or hostile behaviour of another group of people or individual.

Bullying may involve a misuse of power or position and is often persistent and unpredictable. It may be vindictive, cruel or malicious. However it can also arise when a person is unaware of the effect that their behaviour is having on other persons, or does not have any intention to bully.

## EXAMPLES OF BULLYING

The following may be found to be examples of bullying:

- Verbal or physical threats or abuse, such as shouting or swearing at colleagues, either in public or in private, including derogatory or stereotyped statements or remarks;
- Personal insults;
- Belittling or ridiculing a person, or his/her abilities, either in private or in front of others;
- Sudden rages or displays of temper against an individual or group, often for trivial reasons;
- Subjecting someone to unnecessary excessive or oppressive supervision, monitoring everything they do or being excessively critical of minor things;
- Persistent or unjustified criticism;
- Making unreasonable demands of staff or colleagues;
- Setting menial or demeaning tasks that are inappropriate to the job or taking away areas of responsibility from an individual for no justifiable reason;
- Ignoring or excluding an individual from social events, team meetings, discussions and collective decisions or planning;
- Making threats or inappropriate comments about career prospects, job security or performance appraisal reports; and
- Spreading malicious rumours, or insulting someone (particularly regarding age, race, marriage, civil partnership, pregnancy and maternity, sex, disability, sexual orientation, religion or belief, and gender reassignment).
- Shunning people at work and rebuffing their efforts to integrate with others if they are believed to 'not fit in';
- Cyber bullying including inappropriate:
  - Suggestive and unwanted remarks;
  - Graphics or threat-centred, abusive emails;
  - Postings on social networks; and
  - Text messages.
- There are sometimes situations when excuses are made to, define or refer to behaviour or situations between people at work which may involve 'hidden' bullying:
  - Strong or robust management styles;
  - A working relationship that is described as a 'personality clash';
  - Someone being described as 'over-sensitive' or 'unable to take a joke';
  - Describing someone as having an 'attitude problem';
  - A manager who 'has a low tolerance for non-safety critical mistakes which are made unintentionally; and
  - Making fun of someone who has made a minor mistake at work.

# A COMPANY POLICY ON HARASSMENT AND BULLYING

Companies should ensure that they have a clearly written policy statement on the elimination of harassment and bullying. An example of such a policy can be found at Appendix 1.

The policy statement should:

- Contain a message from the Chief Executive or equivalent in the company;
- Set out the company's commitment to the elimination of harassment and bullying from on board ships and the goal of a working environment in which there is respect for the dignity and well-being of all seafarers;
- Identify a director or appropriate member of senior management in the company as the person with overall responsibility for the policy;
- Contain examples of the types of behaviour that may be classed as harassment and bullying (see page 7 and 8); and
- Contain contact information to enable seafarers to report incidents.

The company may wish to discuss the policy with employee representatives and/or seafarers' organisations to obtain their support and commitment.

Once agreed, the company should ensure that all seafarers and relevant shore based personnel, are made aware of the policy and understand it. They should be presented with copies of documents containing the policy and a similar document should be displayed prominently on noticeboards on board ships and in shore-side offices.

## COMMITMENT FROM SEAFARERS' ORGANISATIONS

Seafarers' organisations should have a clearly written policy statement on the elimination of harassment and bullying. It should:

- Remind seafarers that the ship is often their fellow crew members' home for a long period of time and it is therefore very important for everyone to respect one another and to recognise different cultural styles and behaviours, and to embrace diversity on board the ship. This may mean learning to modify behaviour to avoid unintentionally upsetting a fellow seafarer;
- Remind seafarers of their responsibilities towards fellow crew members in situations where they observe harassment and bullying; and

Seafarers' organisations should also support and promote adherence to the company policy and the procedures within and thus contribute to elimination of harassment and bullying on board ships.

The policy should include a statement regarding cyber bullying. An example of a suitable statement could be:

'Cyber bullying is the use of modern communication technologies to harass, embarrass, humiliate, threaten, or intimidate an individual in an attempt to gain power and control over them. The use of the company's communication equipment for such purposes will be treated as a serious breach of the company code of conduct and result in disciplinary action against perpetrators'.

The company might also consider running workshops and/or seminars to ensure smooth implementation and understanding of the policy.

A company statement to all staff about the company's policy, standards of behaviour expected and the support it will provide can help make all individuals fully aware of their responsibilities to others.

- Set out ways that encourage those who witness harassment and bullying to report such incidences either on board, or to a director ashore or appropriate member of senior management ashore with overall responsibility for the policy.

Seafarers' organisations should also produce information materials regarding how to handle incidences of cyber bullying.

# IDENTIFYING AND REPORTING INCIDENTS OF HARASSMENT AND BULLYING

## REPORTING

In order to tackle harassment and bullying, it is important that the company actively encourages its seafarers to bring incidents to its attention without delay.

Addressing harassment and bullying on board ships requires seafarers to report incidents, including those that affect others.

On board ships sufferers of harassment and bullying may endure it until the end of the voyage and ask to be transferred to a different vessel for their next voyage, instead of reporting it.

## COMPLAINTS PROCEDURES

Companies should maintain fair procedures for dealing promptly with complaints from seafarers. Complaints of harassment and bullying can usually be dealt with using clear grievance and disciplinary procedures. Such procedures should:

- Provide for confidentiality;
- Provide safeguards against victimisation of the complainant;
- Provide safeguards for both the person making the complaint and the alleged perpetrator to be accompanied by a fellow employee or seafarer representative of their choice; and
- Ensure that the parties to the complaint are treated with equal dignity and fairness.

It is important that seafarers are aware that complaints of bullying or harassment, or information from staff relating to such complaints, will be dealt with fairly, confidentially, sensitively and expeditiously. Seafarers may be reluctant to come forward if they feel they:

- May be treated unsympathetically; or
- Are likely to be confronted aggressively by the person about whose behaviour they complain.

## HARASSMENT AND BULLYING GRIEVANCE PROCEDURE

Companies should have procedures to report and handle complaints of harassment and bullying in which all seafarers have confidence. This will only be effective if seafarers are willing to intervene when necessary to support colleagues that are affected. Companies may wish to consider keeping this procedure separate from the general company grievance procedure. It should be consistent with the company's complaints procedures.

The company should designate a person or persons to act as the first point of reference for each seafarer that wishes to make a complaint. This person could be a member of the ship's crew, a company employee based ashore, or a person designated by the company to act on its behalf.

If the designated person is a company employee, that person should be given the authority to deal with the complaint, or to choose to refer it to a higher level in the company. As well as the formal procedure, the company should provide the victim of harassment or bullying with the option, at their discretion, of resolving their complaint informally. This could involve the victim explaining the effects of the alleged perpetrator's actions in the presence of another person from the company trained in resolution of complaints. The alleged perpetrator may then be offered an opportunity to apologise for their actions and undertake not to repeat them. A victim should never be made to face an alleged perpetrator if they do not wish to.

The company may wish to:

- Consider using an independent third party based ashore to whom those suffering harassment or bullying might address their complaints; or
- Make its seafarers aware of confidential helplines provided by seafarers' organisations.

A system whereby complaints are heard by others onboard may be effective on ships with large numbers of crew members and officers.

Where a ship has a smaller crew complement, it may also be advisable for a point of contact ashore to be available to crew members for the reporting of incidents.

## RESPONDING TO A COMPLAINT OF BULLYING AND/OR HARASSMENT

Complaints should be investigated promptly and objectively, recognising that seafarers do not normally make an accusation unless they feel seriously aggrieved. Any investigation must be seen to be objective and independent.

Companies investigating claims of harassment and bullying should consider all the circumstances and conduct an objective investigation before reaching a conclusion. Seafarers should be able to be accompanied or represented, and be provided with safeguards against the possibility of victimization for filing complaints. "Victimization" covers any adverse action taken by any person with respect to lodging a complaint which is not manifestly vexatious or maliciously made.

## INFORMAL PROCESS

If a seafarer believes they are being harassed, they should tell the person responsible that they find their behaviour inappropriate and ask them to stop. Sometimes people are not aware that their behaviour is unwelcome and causing distress. Seafarers may choose to refer any incident(s) of harassment confidentially to the person designated as the first point of reference on board the ship or ashore. The designated person should listen to the complaint and provide support and assistance if the victim does not wish to initiate a formal process. An informal discussion can often lead to greater understanding and an agreement for the behaviour to cease.

## FORMAL PROCESS

If harassment and bullying continues, or a victim is unable or unwilling to confront the alleged perpetrator, then the alleged incident should be reported to the designated person on board the ship. A meeting should be arranged where the seafarer may be accompanied by another seafarer of their choice on board the ship concerned, at which the victim will be asked to make a formal complaint. Where a complaint has been made, an investigation should take place in accordance with company procedures to determine whether action should be taken.

Where an investigation shows that a complaint is well founded it may be necessary to separate those involved. If practicable, in these instances every effort should be made to move the alleged perpetrator and not the affected seafarer, unless the affected seafarer has expressed a desire to be transferred.

If it is decided to follow disciplinary proceedings the person being investigated should be able to be represented by an appropriate person.

Companies may wish to establish procedures in conjunction with the relevant seafarers' organisation(s).

## CONFIDENTIALITY

Companies should:

- Investigate every complaint in a way appropriate to the circumstances and in accordance with company policy and procedures;
- Ensure that no seafarer who makes a complaint suffers repercussions; and
- Include the right of the seafarer to be accompanied or represented during the complaints procedure as well as safeguards against the possibility of victimization of seafarers for filing complaints.

Where possible, a complaint of sexual harassment should be investigated by an individual of the same gender as the person raising the complaint.

## HEARINGS

Procedures should provide that hearings, including any resulting disciplinary hearings, are held in confidence. Companies should advise the parties involved of their right to be accompanied by an appropriate person who can, on a confidential basis, provide seafarers with impartial advice on their complaint and otherwise assist them in following the complaints procedure.

The principles of fair treatment should be applied to all disciplinary and grievance hearings. The respondent should have the right to answer any complaint and give their version of events and circumstances. Both the complainant and the respondent should be able to call witnesses. The company should also keep a written record of decisions taken.

## RESOLUTION OF CASE/ACTION

Upon resolution, if the complaint is upheld, the company and seafarers' organisation should ensure that appropriate action is taken with regard to handling the perpetrator of the harassment when taking remedial action and provision of necessary support to the victim. It would be inappropriate to respond by simply moving the victim to a different job or ship as a way of resolving a case of harassment or bullying.

# MEASURES TO ELIMINATE HARASSMENT AND BULLYING

Company disciplinary codes may identify certain acts which could constitute harassment and/or bullying for which disciplinary action may be taken. Examples include:

- Physical assault including sexual assault;
- Intimidation;
- Coercion;
- Interference with the work of other seafarers; and
- Conduct based on gender affecting the dignity of women and men at work which is unwanted, unreasonable and/or offensive to the recipient.

It is possible that sexual harassment may be deemed to have occurred irrespective of whether it was intended by the alleged perpetrator. This is because it is related to the effect it has on the individual concerned.

Shipping companies and seafarers organisations should:

- Support the right of everyone to be treated with dignity and respect at work;
- Actively promote a working environment in which harassment and bullying are not tolerated; and
- Ensure that all seafarers are aware of their responsibilities.

The company should clearly identify standards of behaviour expected of seafarers. Seafarers should know to whom they can turn if they have a work-related problem, and managers should be trained in all aspects of the company's policies in this sensitive area.

Staff handbooks are a good way of communicating with seafarers and can focus on the company's policy on eliminating harassment and bullying, the support available and consequences for any seafarer considered to be in breach of the company policy.

Likewise seafarers should:

- Support the right of everyone to be treated with dignity and respect at work;
- Actively embrace a working environment in which harassment and bullying are not tolerated;
- Respect appropriate standards of behaviour;
- Know to whom they can turn if they have a work-related problem; and
- Ensure colleagues are aware of their responsibilities under the company's policy.



# COMMUNICATION AND AWARENESS

Policies will only eliminate harassment and bullying on board ships if supported by positive action to make them effective. Therefore communication and awareness is important to ensure that seafarers:

- Understand the company's commitment to prevent harassment and bullying;
- Understand their responsibility and role in the process;
- Know how to seek advice and guidance; and
- Know how to make a complaint and are confident they will be heard effectively.

Companies and seafarers' organisations can help ensure that their commitment to eliminate harassment and bullying is communicated effectively through for example:

- Awareness programmes;
- Briefings to seafarers;
- Posters;
- Notices on staff notice boards;
- A section in the staff handbook;
- Management guides;
- Seafarer guides;
- Advisers who can guide seafarers through the policy and procedures;
- Articles in the staff/union magazines;
- Inclusions in briefing meetings; and
- Inductions.

All policies and procedures should be kept under review to ensure they remain effective.

## AWARENESS-RAISING ACTIVITIES

Companies and seafarers organisations may wish to:

- Arrange for seafarers to participate in educational programmes explaining the undesirable effects of harassment and bullying and setting out the company's policy;
- Use programmes to set out the mechanics of the company's procedures for the reporting of incidents;
- Consider provision of literature, posters and videos to underpin and reinforce corporate policies; or
- Make training programmes available to all new and existing employees.



# APPENDICES

## APPENDIX 1

### EXAMPLE COMPANY POLICY ON HARASSMENT AND BULLYING

Company x will treat all complaints of harassment and bullying seriously and in strict confidence.

Your senior officer on board and personnel manager ashore have been trained in dealing with complaints of harassment and bullying. You may approach either or both to report any incident you have suffered.

The company considers any complaint of cyber bullying to be a serious issue.

If you do not feel comfortable raising a complaint yourself, you may ask a friend or colleague to do so on your behalf. You will not be penalised by the company for making a complaint, provided it is not vexatious or made maliciously.

Remember, it is the victim's perception of any actions that counts. If YOU feel you have suffered harassment or bullying, the company will look into the issue raised.

Company Name:

Contacts:

## APPENDIX 2

### SUGGESTED TEXT OF LEAFLET FOR SEAFARERS

#### OBLIGATIONS AND RESPONSIBILITIES OF SEAFARERS

No seafarers should be harassed or bullied on board ships. All seafarers have a responsibility for ensuring that their ship is free of harassment and bullying. Your company takes harassment and bullying very seriously.

#### DO YOU HARASS OR BULLY OTHER SEAFARERS?

Harassment includes any act which creates feelings of unease, humiliation, embarrassment, intimidation, or discomfort to the person on the receiving end.

Bullying may include any negative or hostile behaviour that makes a recipient feel intimidated. You may be unaware of the effect of your own actions on other seafarers and may need to modify your approach. Possible examples include:

- Do you consider that your way of doing a job is always right?
- Do you raise your voice at others?
- Are you sarcastic or patronising to others?
- Do you criticise individuals in front of others?
- Do you criticise minor non-safety critical errors and fail to give credit for good work?
- Do you shun any others or spread rumours or malicious gossip?

If you are concerned that aspects of your behaviour could be considered harassment or bullying, your company can help you to eradicate these aspects. However, you should approach your line manager and seek assistance – don't wait until a complaint is made against you!

# ACKNOWLEDGEMENTS

ICS and ITF would like to acknowledge the contributions of the following organisations in the production of this guidance:

- European Community Shipowners' Associations
- European Transport Workers' Federation
- International Labour Organization
- Nautilus International
- UK Chamber of Shipping

# ADDITIONAL RESOURCES

A useful package of materials relevant to the elimination of harassment and bullying, including videos and workbooks, has been produced by the European Community Shipowners' Associations, the European Transport Workers' Federation and Videotel.

These resources can be found at:

[www.etf-europe.org/BullyingAndHarassment.cfm](http://www.etf-europe.org/BullyingAndHarassment.cfm)



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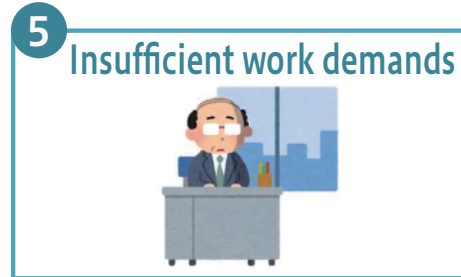
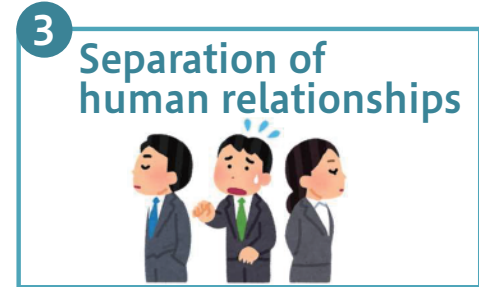
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# The revised act requires employers to take measures to prevent power harassment in the workplace, from April 1, 2022 (Japan)

Power harassment in the workplace is defined as acts that **meet all of the three following criteria.**

1. Language or behavior, delivered from a position of power, which
2. exceeds the necessary and reasonable scope of work duties, and is
3. detrimental to the working environment of the worker

Typical example



Prepared based on “*Harassment prevention in the workplace,*” the Guidance Division, Employment Environment and Equal Opportunity Department, Osaka Labor Bureau

# The health effects of harassment



Post-traumatic stress symptoms



Depression, Psychological stress



Cardiovascular disease,  
Physical symptoms, Pain

# The health effects of harassment (at work)



Exhaustion, Resignation



Absenteeism, Leave of absence



Productivity decline

# Establishment and operation of an effective harassment consultation desk

Well then, where should the harassment consultation desk be located within the company and how should it be operated?

Here, we will explain how to set up and operate a consultation desk so that when a contact person receives a harassment complaint, they can respond appropriately while protecting the victim's privacy.

Not only people in charge of human resources at companies that are actually setting up consultation desks, but also seafarers should ask whether their company has a harassment consultation desk with the following content and how to consult with them. Please check in advance.

## ①Establishment of a consultation desk

- 1) Points to consider when setting up a desk
- There are two types of consultation desks: an internal consultation desk and an external consultation desk.
  - Victims may find it difficult to seek advice on board ships, so ensure that they can directly contact the company's labor management department or human resources department directly by email or cell phone. It is important to first consider making it easy for seafarers to ask questions and give them a sense of security.
  - In cases where power harassment and other forms of harassment are combined, it is necessary to set up an integrated point of contact for consultation, rather than separate points of contact, in order to respond quickly and appropriately.
  - For small and medium-sized businesses, where it is difficult to establish a system on their own, it may be possible to set up a centralized consultation desk within the group of company concerned that takes privacy into consideration.

<Example of an internal consultation desk>

- Respond by designating managers and employees as harassment counselors.
- Human resources (maritime positions)/labor department
- Compliance department, audit department, human rights (awareness) department, legal department
- In-house medical service, industrial physician, counselor
  - \* One option is to contact human resources, after confirming his or her intentions during the interview based on the results of the stress check conducted by the occupational health physician or public health nurse.
- Labor union

<Example of an external consultation desk>

- Offices of lawyers and labor and social security attorney
- Anti-harassment consulting company
- A company that provides mental health, health counseling, harassment counseling, etc.
- An external counselor

2) Selection of the person in charge of counseling at the counter

- The role of the person in charge of the consultation may be limited to accepting consultations (primary response), or the role may include confirming other facts. If the person in charge is only responsible for accepting consultations, it is also possible to create a system in which the subsequent fact-finding investigation is handed over to the human resources department, etc.
- When setting up a consultation desk within a company, the person in charge must have sufficient response skills through prior training, have a sufficient understanding of harassment and human rights issues, receive advice from a neutral standpoint, and resolve the case. We need people who can work toward this goal.

- A consultation desk may be simply set up as a formality, but it is meaningless if it does not actually function when actual consultations or requests are received. It is important for the person in charge of the consultation desk to understand his/her role as the person in charge, as well as the process of responding and how to prepare for the process (②“Consultation Process”).
- In addition, contact personnel must be fully aware that unfavorable disciplinary action such as dismissal or demotion against complainant who have consulted with the contact point or provided answers to the facts is prohibited. It is also necessary to make every crew member aware of this fact. This means that seafarers seeking advice can do so in peace.

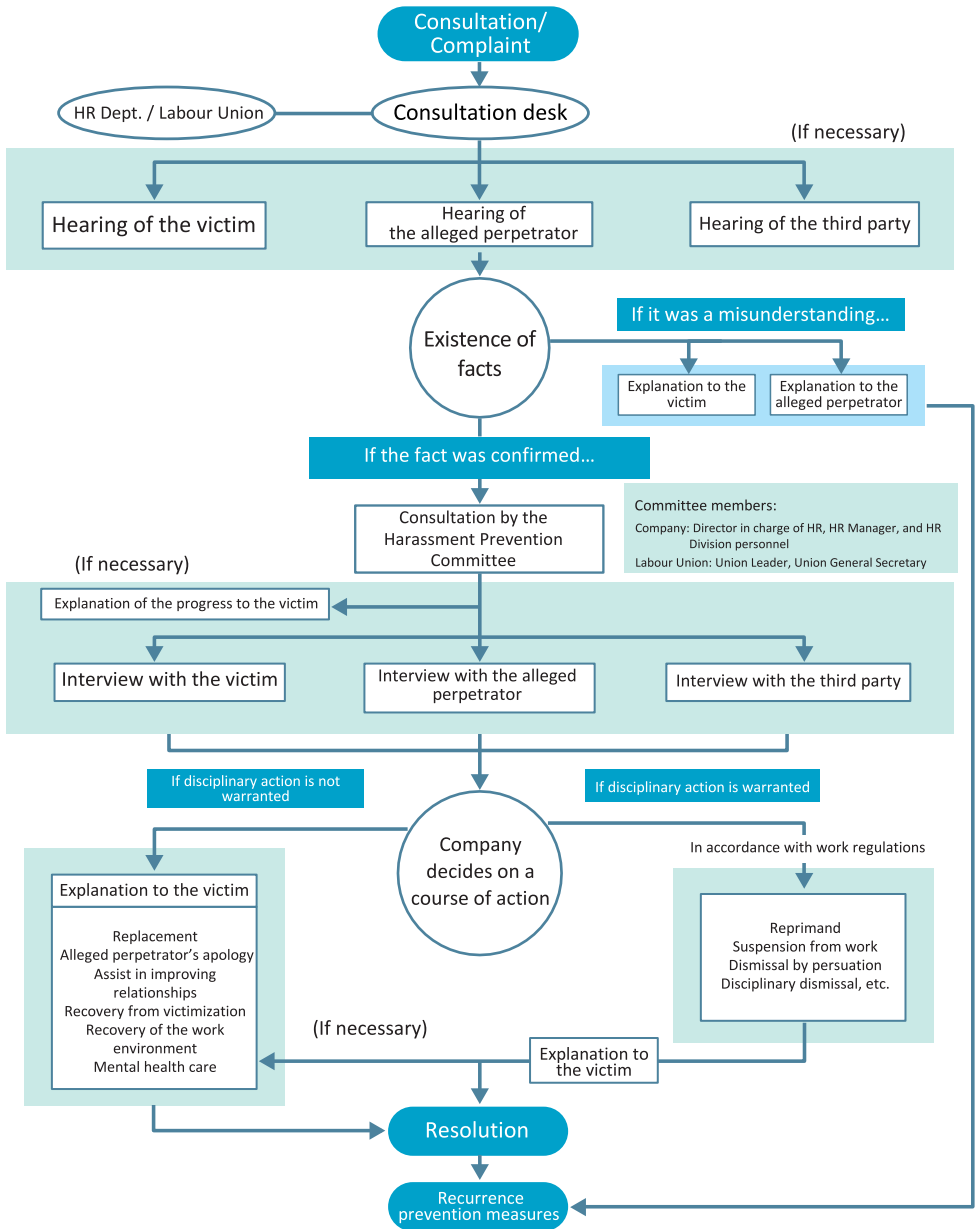
## ② Consultation Process

For example, the flow from the consultation desk (first response) to prevent recurrence measures can be considered as follows.

- 1) Consultation reception and hearing (first response)
- 2) Confirmation of the facts
- 3) Consideration of measures to be taken against the alleged perpetrator/victim
- 4) Follow-up of the alleged perpetrator/victim
- 5) Consideration of measures to prevent recurrence

Please refer to the flow chart (of the Ministry of Health, Labor and Welfare) in Appendix (See to next page) for this process in detail.

## A Flow of Response to Consultation/Complaint (example)



Source: "Employers are now required to take measures to prevent power harassment in the workplace!", Ministry of Health, Labour and Welfare (2017, ), p.40

### ③ Ideas for consulting with peace of mind

- 1) Seafarers (victims) who seek consultation about harassment are filled with a range of emotions, including anxiety, fear, anger, and suspicion, but they use the consultation service because they want the person in charge to listen to their situation and their feelings first. On the other hand, in many cases, the seafarer alleged perpetrator is not aware that he or she has committed the harassment.
- 2) Therefore, the person in charge of the consultation desk must respond to the victim seeking consultation (primary response), confirm the facts, and carry out the necessary subsequent procedures properly. It is necessary to organize the items and steps well in advance.
- 3) Ideas to help the victim feel safe  
Here are some points to help the person in charge respond quickly and accurately to your initial consultation.

#### A) Protecting the privacy of the victim

- When you receive a request for consultation from the victim, first consider the method of contact and the location of the meeting to protect the confidentiality of the person.

Specifically, regarding the location of the consultation, if you are on shore, try to maintain victim's privacy by using a conference room or other location outside of the office where other employees are present. Additionally, if it is not possible to consult on board ship, arrangements should be made for the person on board to report the problem directly to the company's harassment consultation desk.

#### B) Prompt response to consultations

- If a request for consultation is received on board ship, it is advisable to respond promptly and, when actually responding to the consultation, it is desirable to conduct a face-to-face interview so that

the person seeking the consultation can feel comfortable and receive a thorough explanation.

If it is not possible to conduct an interview on board ship, ensure that the victim can make a complaint directly to the company's harassment consultation desk and then confirm the place, date and time of the consultation.

C) System for responding to consultations

- Understand the victim's story thoroughly to avoid discrepancies later. If possible, it is desirable to have several people respond, including a person with the same sex as the victim.

D) Consultations (required actions before listening to specific stories)

- First, inform the victim of the following:
  - Your privacy will be protected, so feel free to talk about anything you want.
  - Persons in charge have a duty of confidentiality.
  - Your consultation will not be treated unfavorably.
- In addition, you will obtain the victim's consent to record what you have heard from him/her on the record sheet.

E) Consultation (listening to specific stories)

- It is important to listen slowly and take your time to hear to what the victim's person's saying, and not to rush the conversation (listen carefully).
- The person in charge needs to be neutral and listen to the victims person concerned without interfering.
- In order to accurately understand the content of the consultation, the following points should be noted.
  - Who is the alleged perpetrator?
  - When, where and what was said (done)?
  - At work or outside work?
  - Previous words and actions (if any, number and frequency)?

- Is there anyone around the person who is aware of the situation?
- Is there anyone other than the person who has received similar treatment?
- Reaction of colleagues
- Is there anyone else you have consulted with?
- What kind of response do you need as a victim?

F) Consultation (after hearing the content of the consultation)

- After listening to a series of consultations, check with the victim who consulted you to confirm that the content of the consultation is correct and to check the content of your notes, etc.
- In relation to this consultation, it is of most importance to ascertain the victim's willingness to investigate the facts.
- If the victim wishes to investigate the facts, give them an idea of what the next steps will be and how long the investigation will take.
  - In addition to the alleged perpetrator of the harassment, a third party should also be investigated if the facts are not consistent.
  - If, as a result of the investigation, it is determined that power harassment has occurred, the human resources department will take measures such as personnel consideration for the complainant and disciplinary action against the perpetrator.
  - The results of fact-finding and disciplinary action will be communicated to the victim  
(Except in cases where employment regulations provide that the company will not disclose the results of the investigation or information obtained during the investigation process)
  - During the investigation, do not disclose to any third party the fact that an investigation is being conducted, and do not discuss the matter with the alleged perpetrator.
  - If you are subjected to retaliation by the alleged perpetrator during the course of the investigation, report it to the consultation desk.
- As a person in charge of the consultation service, you should

be careful not to simply judge whether the complaint applies to the harassment simply by listening to what the victim says. Similarly, you should not simply refuse to proceed if the complaint is sensitive as to whether or not it constitutes harassment."

- The content of the hearing will be organized and recorded on the consultation record sheet for subsequent procedures.
- Here, the person responsible for the consultation desk should summarize the key points for an appropriate response when receiving a consultation.
  - 1) Listening to the victims and verifying the facts
  - 2) Respect the human rights and privacy of those involved.
  - 3) Do not make judgment based on preconceived ideas about the victim or those involved.
  - 4) Respect the wishes and intentions of victims
  - 5) Ensure the physical and psychological safety and security of victims

<Reference>

- The basic steps and points to be followed by those responding to consultations (primary response) are set out below.

Reference: "For harassment measures for foreign workers" Ministry of Health, Labor and Welfare (2019)

[https://www.no-harassment.mhlw.go.jp/foreign\\_workers\\_en](https://www.no-harassment.mhlw.go.jp/foreign_workers_en)

- 4) Procedures after interviewing victims
- Next, we will describe the points that the personnel department personnel should follow after interviewing the victim.

( i ) Hearing from the alleged perpetrator

- You will hear the facts of the case, including whether there was a strong reprimand.
- It is important to listen fully to the alleged perpetrator from a neutral point of view, including the background and intentions behind the

instruction, his own situation, and the state of mind of which he is accused.

- Finally, check that there are no mistakes in what he/she have heard.
- Inform the alleged perpetrator of future procedures, etc.
  - If necessary, interview crew members from other departments on the ship.
  - Consult your internal human resources department (department in charge of harassment, internal committee that reviews harassment, etc.) regarding future actions.
  - Possibility of being subject to review by internal committees, etc.
  - During the investigation, it is forbidden to tell others about the investigation or discuss it with the victim.

(ii) Hearing from parties other than the victim and the alleged perpetrator

- If necessary, we will also interview crew members from the same department on board the ship, as well as crew members from other departments who were present or witnessed the incident, regarding the circumstances and background of the act.
- During the hearing, we will ask about the facts and opinions from the perspective of a third party, other than the person concerned, the victim.
- If you conduct hearing with a third party, you will ensure them that confidentiality is maintained so that the contents of the hearing are not disclosed to others.

(iii) Passing the contents of the hearing to the human resources department, etc.

- After organizing and recording the information gathered from the victim, the alleged perpetrator, and related parties in a consultation record sheet, the information is handed over to the department in charge of the subsequent procedure.

- (iv) Consideration of measures to be taken against the victim/alleged perpetrator by the department in charge of human resources, etc.
- In determining what action a company should take, it is necessary to have a comprehensive view of the various factors below.
    - Purpose of behavior
    - Background and circumstances of words and actions
    - Content of the work to be performed by the victim and the alleged perpetrator
    - Nature, frequency and continuity of the behavior
    - seafarer's position on board and physical and mental conditions
    - Relationship between the victim and the alleged perpetrator
    - The degree of physical or mental distress suffered by the seafarer as a result of the behavior committed.
- (v) Dealing with the victim and the alleged perpetrator
- Depending on the judgment, you will take disciplinary action and provide guidance to the alleged perpetrator based on the employment regulations and harassment prevention-related provisions based on the employment regulations.
  - Victims will be provided with assistance to improve their relationship with the alleged perpetrator. In addition, you will reassign the victim to separate him/her from the alleged perpetrator, transfer them to another ship or change their shift rotation.
- (vi) Report to the victim
- You will organize the confirmed facts and give the victim details of the response by the Human Resources Department. (However, this does not apply in cases where employment regulations stipulate that the company will not disclose the results of the investigation or information obtained during the investigation process.)
  - When communicating the details of the response, it is necessary to

do so promptly after the response and disciplinary policy has been decided.

## **MLC - Maritime Labour Convention, 2006 (MLC, 2006)** **(Entry into force: 20 Aug 2013)**

### **Regulation 5.1.5 – On-board complaint procedures**

1. Each Member shall require that ships that fly its flag have on-board procedures for the fair, effective and expeditious handling of seafarer complaints alleging breaches of the requirements of this Convention (including seafarers' rights).
2. Each Member shall prohibit and penalize any kind of victimization of a seafarer for filing a complaint.
3. The provisions in this Regulation and related sections of the Code are without prejudice to a seafarer's right to seek redress through whatever legal means the seafarer considers appropriate.

### **Standard A5.1.5 – On-board complaint procedures**

1. Without prejudice to any wider scope that may be given in national laws or regulations or collective agreements, the on-board procedures may be used by seafarers to lodge complaints relating to any matter that is alleged to constitute a breach of the requirements of this Convention (including seafarers' rights).
2. Each Member shall ensure that, in its laws or regulations, appropriate on board complaint procedures are in place to meet the requirements of Regulation 5.1.5. Such procedures shall seek to resolve complaints at the lowest level possible. However, in all cases, seafarers shall have a right to complain directly to the master and, where they consider it necessary, to appropriate external authorities.
3. The on-board complaint procedures shall include the right of the seafarer to be accompanied or represented during the complaints procedure, as well as safeguards against the possibility of victimization of seafarers for filing complaints. The term "victimization" covers any adverse action taken by any person with respect to a seafarer for lodging a complaint which is not manifestly vexatious or maliciously

made.

4. In addition to a copy of their seafarers' employment agreement, all seafarers shall be provided with a copy of the on-board complaint procedures applicable on the ship. This shall include contact information for the competent authority in the flag State and, where different, in the seafarers' country of residence, and the name of a person or persons on board the ship who can, on a confidential basis, provide seafarers with impartial advice on their complaint and otherwise assist them in following the complaint procedures available to them on board the ship.

### **Guideline B5.1.5 – On-board complaint procedures**

1. Subject to any relevant provisions of an applicable collective agreement, the competent authority should, in close consultation with shipowners' and seafarers' organizations, develop a model for fair, expeditious and well-documented on-board complaint-handling procedures for all ships that fly the Member's flag. In developing these procedures the following matters should be considered:
  - (a) many complaints may relate specifically to those individuals to whom the complaint is to be made or even to the master of the ship. In all cases seafarers should also be able to complain directly to the master and to make a complaint externally; and
  - (b) in order to help avoid problems of victimization of seafarers making complaints about matters under this Convention, the procedures should encourage the nomination of a person on board who can advise seafarers on the procedures available to them and, if requested by the complainant seafarer, also attend any meetings or hearings into the subject matter of the complaint.
2. At a minimum the procedures discussed during the consultative process referred to in paragraph 1 of this Guideline should include the following:
  - (a) complaints should be addressed to the head of the department of

- the seafarer lodging the complaint or to the seafarer's superior officer;
- (b) the head of department or superior officer should then attempt to resolve the matter within prescribed time limits appropriate to the seriousness of the issues involved;
  - (c) if the head of department or superior officer cannot resolve the complaint to the satisfaction of the seafarer, the latter may refer it to the master, who should handle the matter personally;
  - (d) seafarers should at all times have the right to be accompanied and to be represented by another seafarer of their choice on board the ship concerned;
  - (e) all complaints and the decisions on them should be recorded and a copy provided to the seafarer concerned;
  - (f) if a complaint cannot be resolved on board, the matter should be referred ashore to the shipowner, who should be given an appropriate time limit for resolving the matter, where appropriate, in consultation with the seafarers concerned or any person they may appoint as their representative; and
  - (g) in all cases seafarers should have a right to file their complaints directly with the master and the shipowner and competent authorities.

### **Regulation 5.2.1 – Inspections in port**

1. Every foreign ship calling, in the normal course of its business or for operational reasons, in the port of a Member may be the subject of inspection in accordance with paragraph 4 of Article V for the purpose of reviewing compliance with the requirements of this Convention (including seafarers' rights) relating to the working and living conditions of seafarers on the ship.
2. Each Member shall accept the maritime labour certificate and the declaration of maritime labour compliance required under Regulation 5.1.3 as prima facie evidence of compliance with the requirements

- of this Convention (including seafarers' rights). Accordingly, the inspection in its ports shall, except in the circumstances specified in the Code, be limited to a review of the certificate and declaration.
3. Inspections in a port shall be carried out by authorized officers in accordance with the provisions of the Code and other applicable international arrangements governing port State control inspections in the Member. Any such inspection shall be limited to verifying that the matter inspected is in conformity with the relevant requirements set out in the Articles and Regulations of this Convention and in Part A only of the Code.
  4. Inspections that may be carried out in accordance with this Regulation shall be based on an effective port State inspection and monitoring system to help ensure that the working and living conditions for seafarers on ships entering a port of the Member concerned meet the requirements of this Convention (including seafarers' rights).
  5. Information about the system referred to in paragraph 4 of this Regulation, including the method used for assessing its effectiveness, shall be included in the Member's reports pursuant to article 22 of the Constitution.

#### **Standard A5.2.1 – Inspections in port**

1. Where an authorized officer, having come on board to carry out an inspection and requested, where applicable, the maritime labour certificate and the declaration of maritime labour compliance, finds that:
  - (a) the required documents are not produced or maintained or are falsely maintained or that the documents produced do not contain the information required by this Convention or are otherwise invalid; or
  - (b) there are clear grounds for believing that the working and living conditions on the ship do not conform to the requirements of this Convention; or

- (c) there are reasonable grounds to believe that the ship has changed flag for the purpose of avoiding compliance with this Convention;  
or
- (d) there is a complaint alleging that specific working and living conditions on the ship do not conform to the requirements of this Convention;

a more detailed inspection may be carried out to ascertain the working and living conditions on board the ship. Such inspection shall in any case be carried out where the working and living conditions believed or alleged to be defective could constitute a clear hazard to the safety, health or security of seafarers or where the authorized officer has grounds to believe that any deficiencies constitute a serious breach of the requirements of this Convention (including seafarers' rights).

2. Where a more detailed inspection is carried out on a foreign ship in the port of a Member by authorized officers in the circumstances set out in subparagraph (a), (b) or (c) of paragraph 1 of this Standard, it shall in principle cover the matters listed in Appendix A5-III.
3. In the case of a complaint under paragraph 1(d) of this Standard, the inspection shall generally be limited to matters within the scope of the complaint, although a complaint, or its investigation, may provide clear grounds for a detailed inspection in accordance with paragraph 1(b) of this Standard. For the purpose of paragraph 1(d) of this Standard, "complaint" means information submitted by a seafarer, a professional body, an association, a trade union or, generally, any person with an interest in the safety of the ship, including an interest in safety or health hazards to seafarers on board.
4. Where, following a more detailed inspection, the working and living conditions on the ship are found not to conform to the requirements of this Convention, the authorized officer shall forthwith bring the deficiencies to the attention of the master of the ship, with required deadlines for their rectification. In the event that such deficiencies

are considered by the authorized officer to be significant, or if they relate to a complaint made in accordance with paragraph 3 of this Standard, the authorized officer shall bring the deficiencies to the attention of the appropriate seafarers' and shipowners' organizations in the Member in which the inspection is carried out, and may:

- (a) notify a representative of the flag State;
  - (b) provide the competent authorities of the next port of call with the relevant information.
5. The Member in which the inspection is carried out shall have the right to transmit a copy of the officer's report, which must be accompanied by any reply received from the competent authorities of the flag State within the prescribed deadline, to the Director-General of the International Labour Office with a view to such action as may be considered appropriate and expedient in order to ensure that a record is kept of such information and that it is brought to the attention of parties which might be interested in availing themselves of relevant recourse procedures.
6. Where, following a more detailed inspection by an authorized officer, the ship is found not to conform to the requirements of this Convention and:
- (a) the conditions on board are clearly hazardous to the safety, health or security of seafarers; or
  - (b) the non-conformity constitutes a serious or repeated breach of the requirements of this Convention (including seafarers' rights);
- the authorized officer shall take steps to ensure that the ship shall not proceed to sea until any non-conformities that fall within the scope of subparagraph (a) or (b) of this paragraph have been rectified, or until the authorized officer has accepted a plan of action to rectify such non-conformities and is satisfied that the plan will be implemented in an expeditious manner. If the ship is prevented from sailing, the authorized officer shall forthwith notify the flag State accordingly and invite a representative of the flag State to be present, if possible,

requesting the flag State to reply within a prescribed deadline. The authorized officer shall also inform forthwith the appropriate shipowners' and seafarers' organizations in the port State in which the inspection was carried out.

7. Each Member shall ensure that its authorized officers are given guidance, of the kind indicated in Part B of the Code, as to the kinds of circumstances justifying detention of a ship under paragraph 6 of this Standard.
8. When implementing their responsibilities under this Standard, each Member shall make all possible efforts to avoid a ship being unduly detained or delayed. If a ship is found to be unduly detained or delayed, compensation shall be paid for any loss or damage suffered. The burden of proof in each case shall be on the complainant.

#### **Guideline B5.2.1 – Inspections in port**

1. The competent authority should develop an inspection policy for authorized officers carrying out inspections under Regulation 5.2.1. The objective of the policy should be to ensure consistency and to otherwise guide inspection and enforcement activities related to the requirements of this Convention (including seafarers' rights). Copies of this policy should be provided to all authorized officers and should be available to the public and shipowners and seafarers.
2. When developing a policy relating to the circumstances warranting a detention of the ship under Standard A5.2.1, paragraph 6, of the competent authority should consider that, with respect to the breaches referred to in Standard A5.2.1, paragraph 6(b), the seriousness could be due to the nature of the deficiency concerned. This would be particularly relevant in the case of the violation of fundamental rights and principles or seafarers' employment and social rights under Articles III and IV. For example, the employment of a person who is under age should be considered as a serious breach even if there is only one such person on board. In other cases,

the number of different defects found during a particular inspection should be taken into account: for example, several instances of defects relating to accommodation or food and catering which do not threaten safety or health might be needed before they should be considered as constituting a serious breach.

3. Members should cooperate with each other to the maximum extent possible in the adoption of internationally agreed guidelines on inspection policies, especially those relating to the circumstances warranting the detention of a ship.

## Chapter 5 caption (re-post) on "4R"

### (1) Realization:

As a basic knowledge of trauma, understand that there is a hypersensitive reaction after a trauma experience.

For example, in the case of maritime labor, it is a post-experience hypersensitive reaction (flashback, hyperventilation, etc.) to a loud reprimand from a manager, and reactions vary according to each person.

### (2) Recognize:

As mentioned above, trauma victims may have intense avoidance reactions such as "closing their eyes" and "shutting themselves in their rooms" to avoid the slightest talk, laughter, or reprimand from their surroundings due to anxiety or fear, and may appear strange to their surroundings.

This can be seen as strange by those around them. The surrounding people should be aware of such reactions of the victim. It is also necessary to understand that everyone has some traumatic experiences.

### (3) Responds:

A way of getting involved the victim based on the understanding that each person has a different type of experience.

For example, victims of bullying, discrimination, etc. generally stigmatize themselves, and hearing the experience again by those around them in a well-meaning way may lead to intense reactions of the victim.

Therefore, it is important to allow some time after the bullying or harassment experience for the victim to feel comfortable having the conversation."

#### (4) Resist Re-Traumatization:

The reactions in (1) and (2) above will diminish the victim's relationship with the surroundings, which may lead to the occurrence of secondary damage from the harassment. In maritime labor, managers need to strictly reprimand young seafarers for their hazardous behavior.

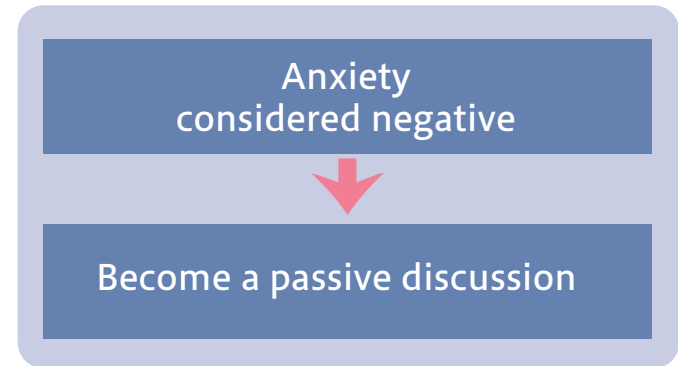
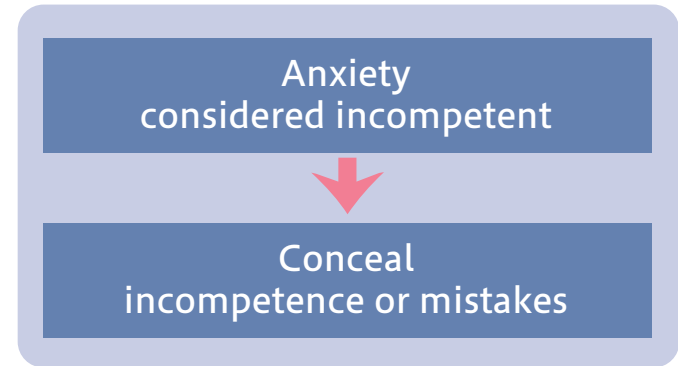
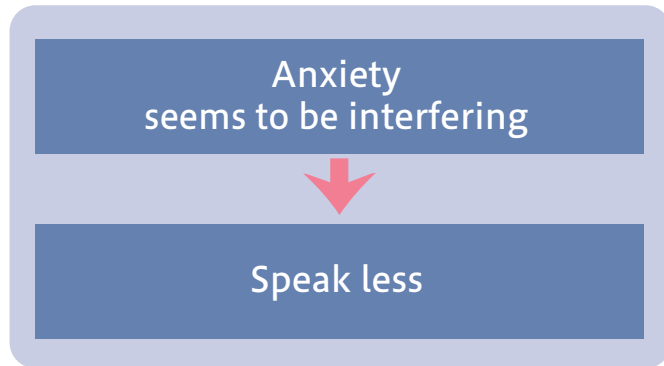
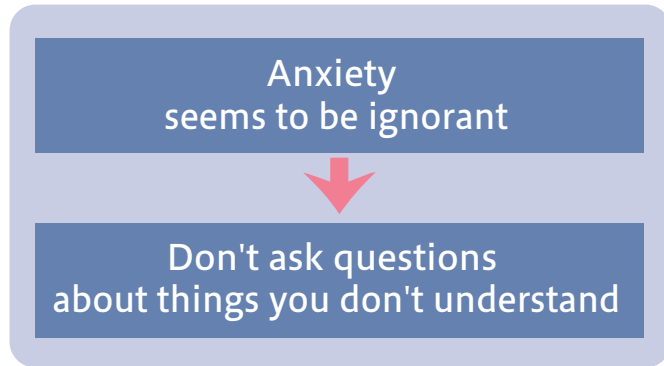
It is necessary for the victim and the manager to have a firm discussion after some time, for example (see (3) above). Leaving the seafarer who shuts down his/her mind alone after the incident may only increase his/her anxiety.

#### Reference:

Substance Abuse and Mental Health Services Administration,  
Department of Health & Human Services, USA,  
SAMHSA's Concept of Trauma and Guidance for a Trauma-Informed Approach,  
2014

# Four Anxiety

caused by low psychological safety



Reference: Irie Masahiro, Industrial Health Counselor, Members of Fukuoka Occupational Health support Center, *Power harassment prevention measures based on psychological safety*, p.10.



## Example Company Policy on Harassment and Bullying

Company x will treat all complaints of harassment and bullying seriously and in strict confidence.

Your senior officer on board and personnel manager ashore have been trained in dealing with complaints of harassment and bullying. You may approach either or both to report any incident you have suffered.

The company considers any complaint of cyber bullying to be a serious issue.

If you do not feel comfortable raising a complaint yourself, you may ask a friend or colleague to do so on your behalf. You will not be penalised by the company for making a complaint, provided it is not vexatious or made maliciously.

Remember, it is the victim's perception of any actions that counts. If YOU feel you have suffered harassment or bullying, the company will look into the issue raised.

Company Name:

Contacts:

Reference: International Chamber of Shipping, International Transport Workers' Federation. (2016)  
*GUIDANCE ON ELIMINATING SHIPBOARD HARASSMENT AND BULLYING*, p.14 Appendices Appendix 1.



## Suggested text of leaflet for seafarers

### Obligations and responsibilities of seafarers

No seafarers should be harassed or bullied on board ships. All seafarers have a responsibility for ensuring that their ship is free of harassment and bullying. Your company takes harassment and bullying very seriously.

### Do you harass or bully other seafarers?

Harassment includes any act which creates feelings of unease, humiliation, embarrassment, intimidation, or discomfort to the person on the receiving end.

Bullying may include any negative or hostile behaviour that makes a recipient feel intimidated. You may be unaware of the effect of your own actions on other seafarers and may need to modify your approach. Possible examples include:

- Do you consider that your way of doing a job is always right?
- Do you raise your voice at others?
- Are you sarcastic or patronising to others?
- Do you criticise individuals in front of others?
- Do you criticise minor non-safety critical errors and fail to give credit for good work?
- Do you shun any others or spread rumours or malicious gossip?

If you are concerned that aspects of your behaviour could be considered harassment or bullying, your company can help you to eradicate these aspects. However, you should approach your line manager and seek assistance – don't wait until a complaint is made against you!

Reference: International Chamber of Shipping, International Transport Workers' Federation. (2016) *GUIDANCE ON ELIMINATING SHIPBOARD HARASSMENT AND BULLYING*, p.14 Appendices Appendix 2.

# Building human relationships and trust through onboard communication

## ① The importance of making manager aware of harassment as early as possible

○ Do your words and actions escalate because of your anger?

For managers, the way their crew members react to them and the difficulty in communicating with them can be a source of concern.

For example, we hear the following voices from the field.

- Crew member does not follow my work procedures
  - I am worried whether the crew member really understands my instructions.
  - I delegated the work because the crew member said, “I can do it,” but you I couldn't do it.
  - I don't really know whether the crew member is listening to my instructions and guidance.
- However, if you start yelling at your fellow seafarers or ignoring what they say because they don't listen even after a long period of guidance or because you don't know if they understand, this goes beyond the scope of proper guidance. Thing. What's more, if you let your emotions dictate your words and actions in a way that criticizes crew member's character, this is more likely to fall under harassment.

<Key points regarding the behavior of the manager>

### 1) Basic attitude to reprimand and guidance

- Reprimand and provide guidance on his/her behavior that is causing

the problem, not on themselves.

- Do not reprimand the crew member himself (“reprimand the behavior”)

## 2) Tips to avoid acting out in anger

- “Do not shout” “(take a breath) and calm down”
- Make a sign saying “I will never shout” and post it in your room
- Put yourself in the other person's shoes and consider how they would feel before you act.

## 3) Listen to different opinions first

- Even if you are confident that you know most about the work and procedures in your department, your crew members will have their own ways of thinking. Instead of dismissing or ignoring the other person's ideas, first listen to the other person's opinions and thoughts (“listen carefully”).
- Then, if there is a difference of opinion about work procedures, for example, the manager should objectively compare which procedures have the greatest advantages and which have the least disadvantages in terms of safety, work efficiency, etc., and then the manager can convince the crew member. You have to explain it in a way that makes sense.

## 4) Alerting from people around you in the onboard workplace

- “Is Mr. A’s guidance becoming like harassment?”

If you see a reprimand or behavior that you think is outside the scope of legitimate guidance, you should alert them as soon as possible, even if they are outside your department, and if it is difficult to do so on board ship, it is very important to contact the human resources department at the head office for advice to nip the problem in the bud before it develops into a harassment incident.

- Of course, within the proper scope of work, passionate education,

guidance and reprimands are necessary.

## ② The importance of conversations from a seafarer who is a crew member.

Of course, harassment cannot be prevented by focusing only on the manager's guidance and conversational style. Harassment is caused by factors such as the attitude of the crew member being coached, the appropriateness of the crew member's response to the manager's guidance, their aggressiveness in their work, and the lack of communication from the crew member to the manager.

- So, what are the current issues being raised about the recent quality and mental health conditions, particularly among new seafarers?
  - Perhaps because of the increasing number of people who have never been scolded at home, some of them feel that they have been scolded and quit when they receive guidance on safety issues.
  - They are unable to keep up with technology and know-how during the company's education and development process, and tend to perceive the guidance of those around them as harassment, leading them to give up on continuing to work.
  - I am concerned that many people lack the awareness, initiative, and sense of self to carry out their own work as members of society.
  - The number of students who are not good at communication (reporting, communicating, consulting) is increasing.
  
- On the other hand, the following keywords are required as the qualities and mental aspects that the company looks for in new seafarers.
  - Manners for working adults, etc.
  - Communication skills
  - Teamwork skills

- Awareness as a seafarer
- Stress tolerance (interpersonal/boarding period)
- Adaptability and energy for life on board
- Adaptability to group life and society

### ③ Importance of daily communication

So, let's think about the importance of communication for young people in daily work and life on board.

#### ○ Working at sea

A ship cannot be navigated by one crew member alone. The trust and cooperation of colleagues is essential. Only through good communication, including mutual understanding and encouragement, can a safe voyage be achieved.

In addition, in order to navigate safely, we must maintain a sense of composure and always remember to strive to acquire the knowledge and skills on a daily basis to deal with any situation.

Your manager may give you strict guidance regarding mistakes or unsafe behavior. When someone scolds you in a harsh tone, you may think it is harassment.

But try to remember the situation in which you were scolded. Have you ever worked without understanding your manager's instructions? Or have you ever missed the movements of other ships while on duty?

Can we recognize strict instructions to ensure the safety of human life, ships and cargoes as harassment?

#### ○ Acquire reliable techniques and knowledge

I often hear that the more experienced you are, the more cautious you become.

This is because our extensive experience has given us the skills and knowledge to anticipate danger.

Furthermore, safe sailing requires not only to have basic skills and knowledge, but also the ability to apply them to various conditions. To achieve this, it is necessary to communicate with your manager and seniors on a daily basis and build relationships of trust.

<Specific example>

- If you feel the least bit uncomfortable during the voyage, report it to your manager.
- Ask your seniors about their experiences and practice and do imagery rehearsal to prepare emergency situations regularly so you can feel comfortable.
- Do not leave any problems or questions unattended, and share them with the captain and other people around you.
- Be prepared to have daily conversations and build relationships so that if you have any work-related questions, you can ask them immediately.

**④ Building relationships of trust through daily communication**

As mentioned above, if both the manager and the crew members can proactively engage in conversation and respond to each other's thoughts and questions one by one, they can naturally build interpersonal relationships and trust. Even if your manager gives you a harsh reprimand at work or during life on board, your concerns about emotional stress and harassment will be alleviated, and you will be able to work with peace of mind.

Of course, the job description isn't the only conversation starter.

By starting the conversation with things like life on board and small talk, you will be able to understand each other's humanity and personalities.

## ⑤ Awareness gained through the collaborative work of managers as instructors

- Managers with long experience in their respective roles may have many concerns about the development of crew members.

The following are some of the comments on staff training expressed by expert engineers.

“It is premature to think that OJT will save time and money spent on training beginners, and you may not expect great results.

Ultimately, when you welcome the newcomers in your workplace, it is best to arrange the environment in which they can grow, considering the process of their growing as the expert, and conditions for establishing their own learning. Those lead to the “royal road” to success.”

“If OJT is carried out in an uncontrolled manner, it may lead to early retirement of new employees due to isolation caused by harassment and psychological abuse.”

“When a new engineer replaces bearings in an electric motor for the first time, he learns how to deal with the tasks of taking off the pump from electric motor, using a gear puller, selecting the right bearing, mounting bearings on the shaft, and aligning the coupling between the pump and electric motor. A series of tasks, such as methods, are learned by working together with an expert, rather than being taught by an expert. By taking part in larger tasks, such as removing pistons, these new engineers will eventually become the main person responsible for the work and take charge.”

“Learning takes place when the learner “wants to be able to do things” and “to be able to do things”. The instructor's job is to create a learning environment in which the learners can solve and acquire the tasks they

need to accomplish on their own, and to develop themselves by co-working with the learners in the learning environment. It is not a matter of treating the learner as a blank canvas and teaching knowledge like the layers of paint.”

- I believe that the best way to provide this kind of guidance is to allow the crew member to improve their behavior on their own initiative.

## ⑥ The need for training and other initiatives for internal communication, etc.

- Business owners should proactively create opportunities for seafarers to attend internal and external training sessions aimed at improving stimulating communication between managers and crew members and facilitating smoother conversations, before or after boarding the ship.

## ⑦ Awareness towards eradicating harassment including harassment and bullying

- So far, we have explained the importance of communication between managers and crew members, with a focus on harassment.
- In addition, in order to prevent acts of harassment other than harassment and bullying, it is important to recognize that each person working in the workplace is responsible for their work, is a valuable human resource for the company, and is an individual with a personality that should be respected. It is important to be aware of each other.

## The target of the survey

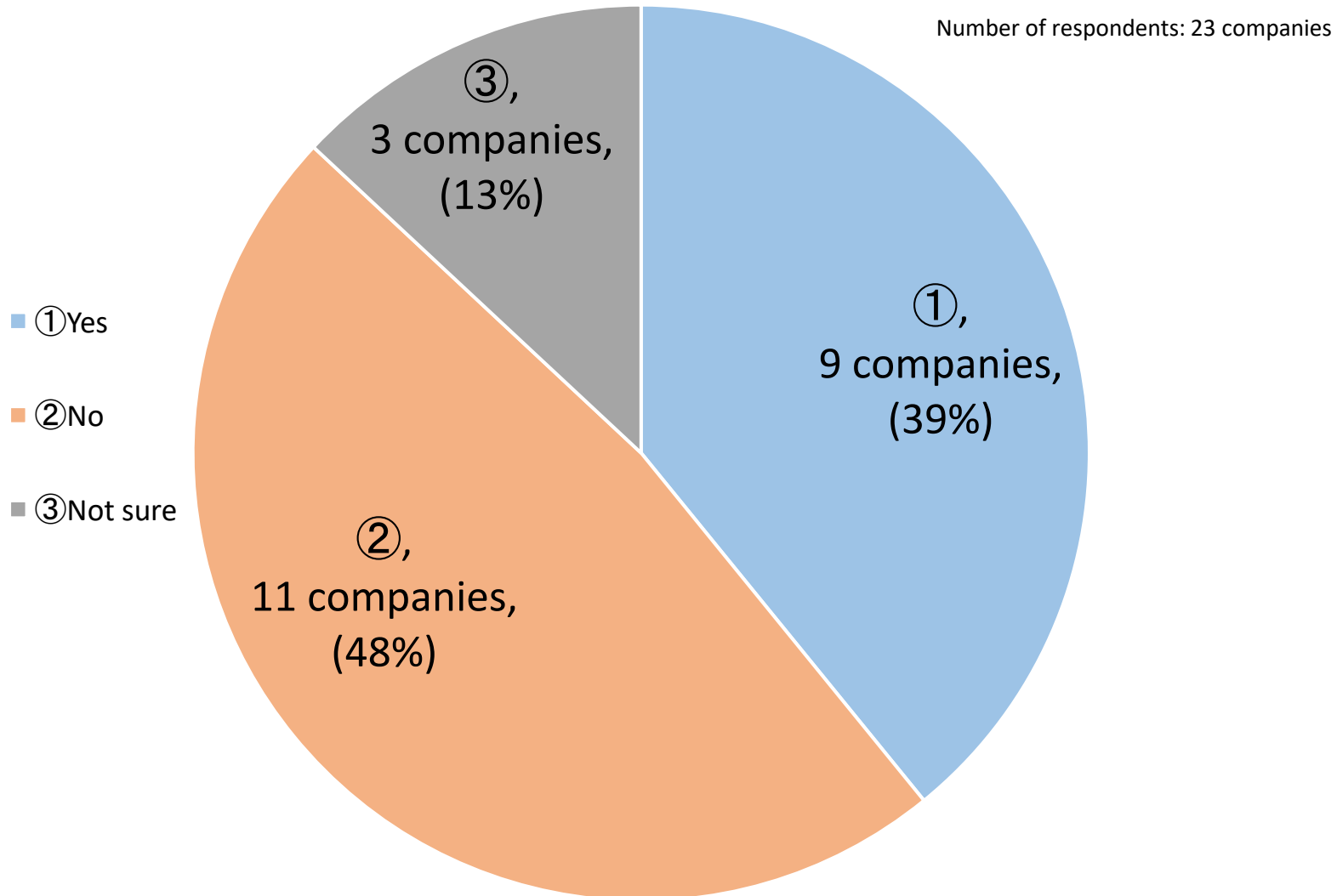
- ① Each shipping company's measures for preventing harassment of seafarers.
  - The presence of a harassment consultation desk and how cases are handled.
  - Efforts for preventing recurrence, etc.
- ② The following matters concerning seafarers.
  - Experience of harassment onboard and its details, if any.
  - Steps to take in case of experiencing harassment.
  - Causes and factors of harassment



# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 1-1) (Responses from Shipping Companies)

(1) In the past three years, has your company had any cases where harassment, bullying, or other forms of harassment of seafarers were suspected through consultations, reports, complaints, etc. from seafarers employed or managed by your company? Please select the applicable item.

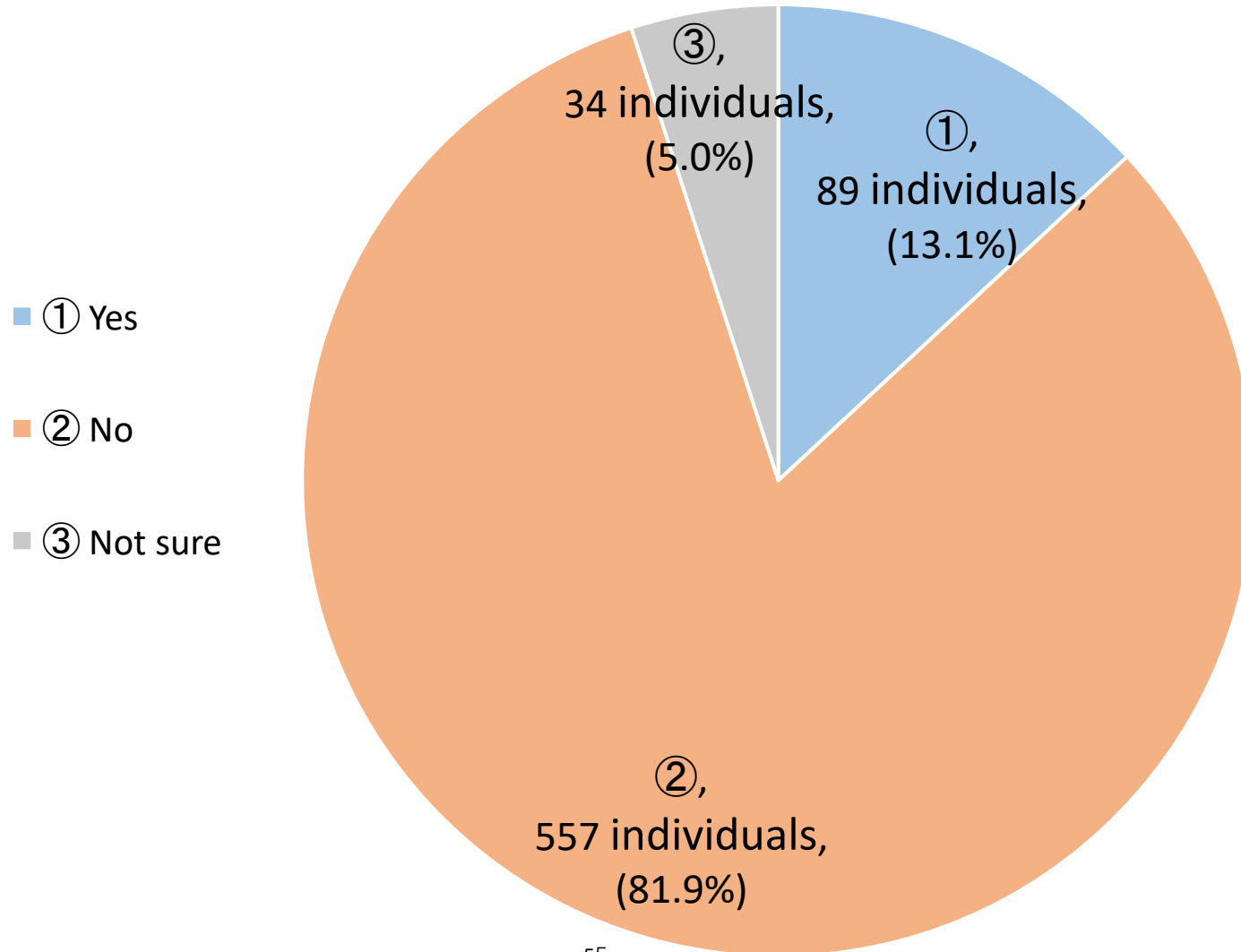


# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 1-2) (Responses from seafarers)

(2) In the past three years, have you experienced any remarks or actions from other seafarers or superiors that caused you mental or physical burden, distress, or had an impact on your psychological or physical well-being?

Number of respondents: 680 individuals



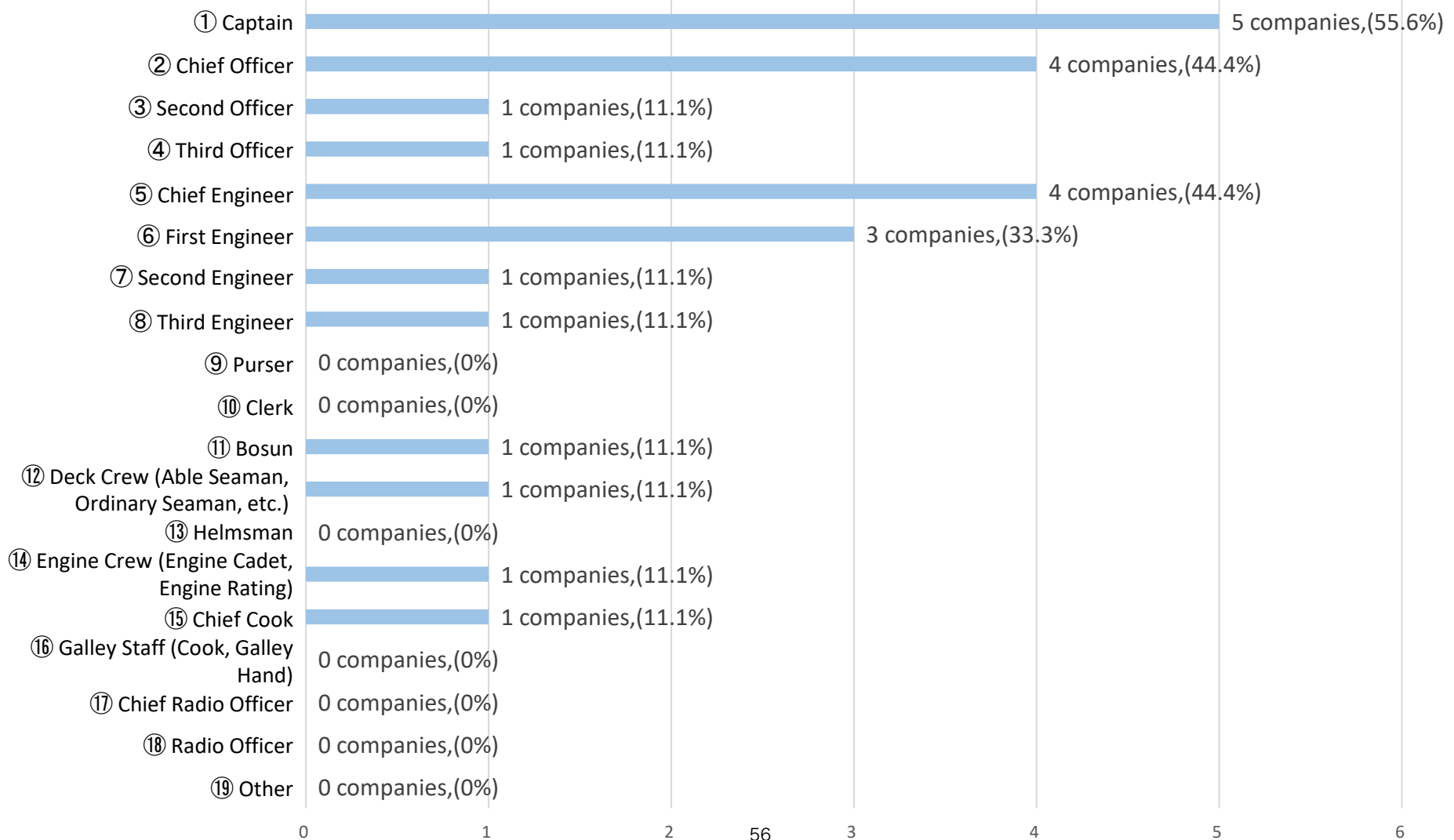
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part1-3)(Responses from Shipping Companies)

(3) For those who selected "① Yes" in question (1), **please indicate the job position(s) of the seafarers who engaged in harassment or bullying.**

Please select all applicable options. If multiple seafarers are involved, please select all corresponding options.

Number of respondents: 9 companies

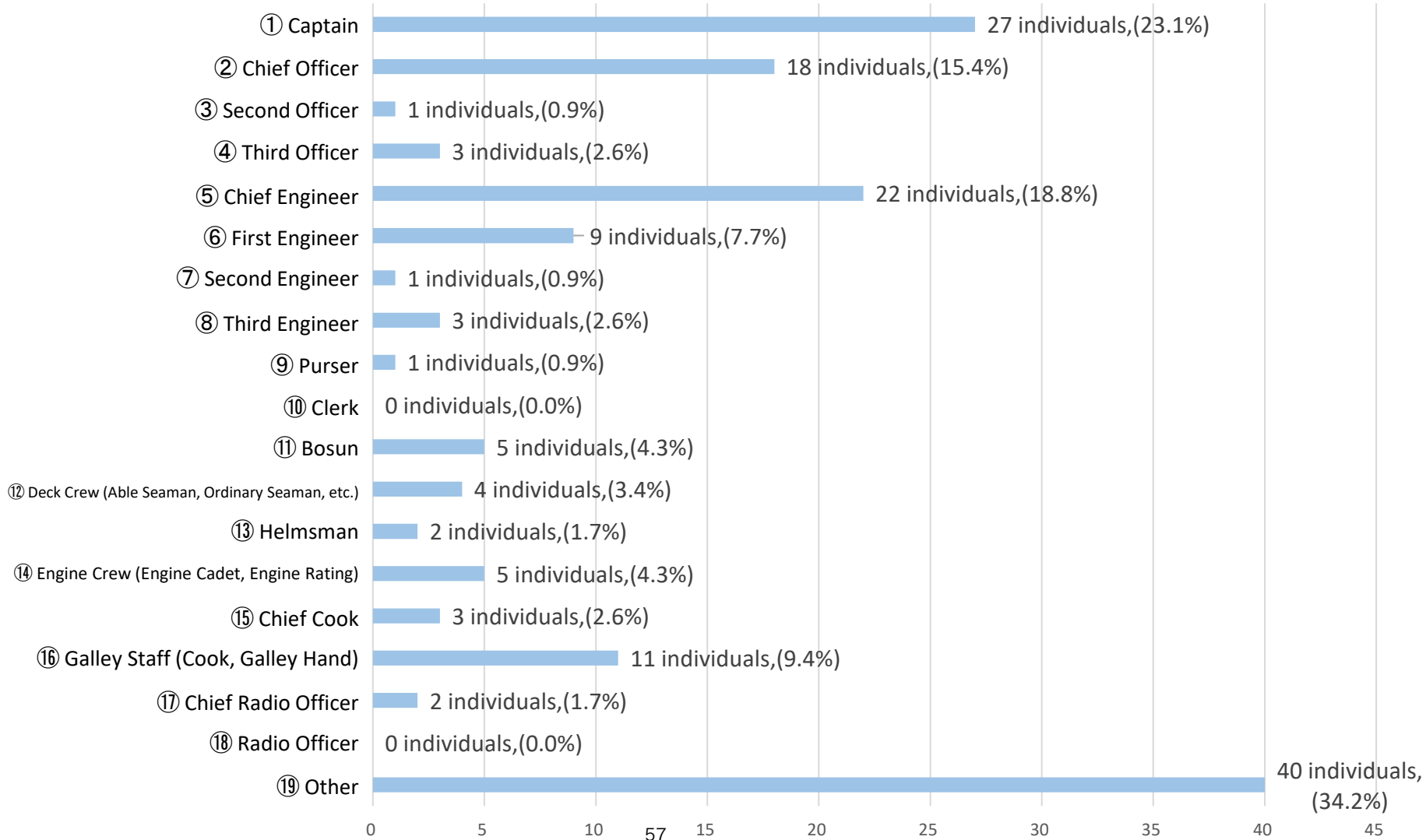


# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 1-4)(Responses from seafarers)

(4) For those who selected "① Yes" in question (2), **please select the position(s) of the other seafarers or superiors who exhibited such behavior onboard.** If multiple positions apply, please select all that apply.

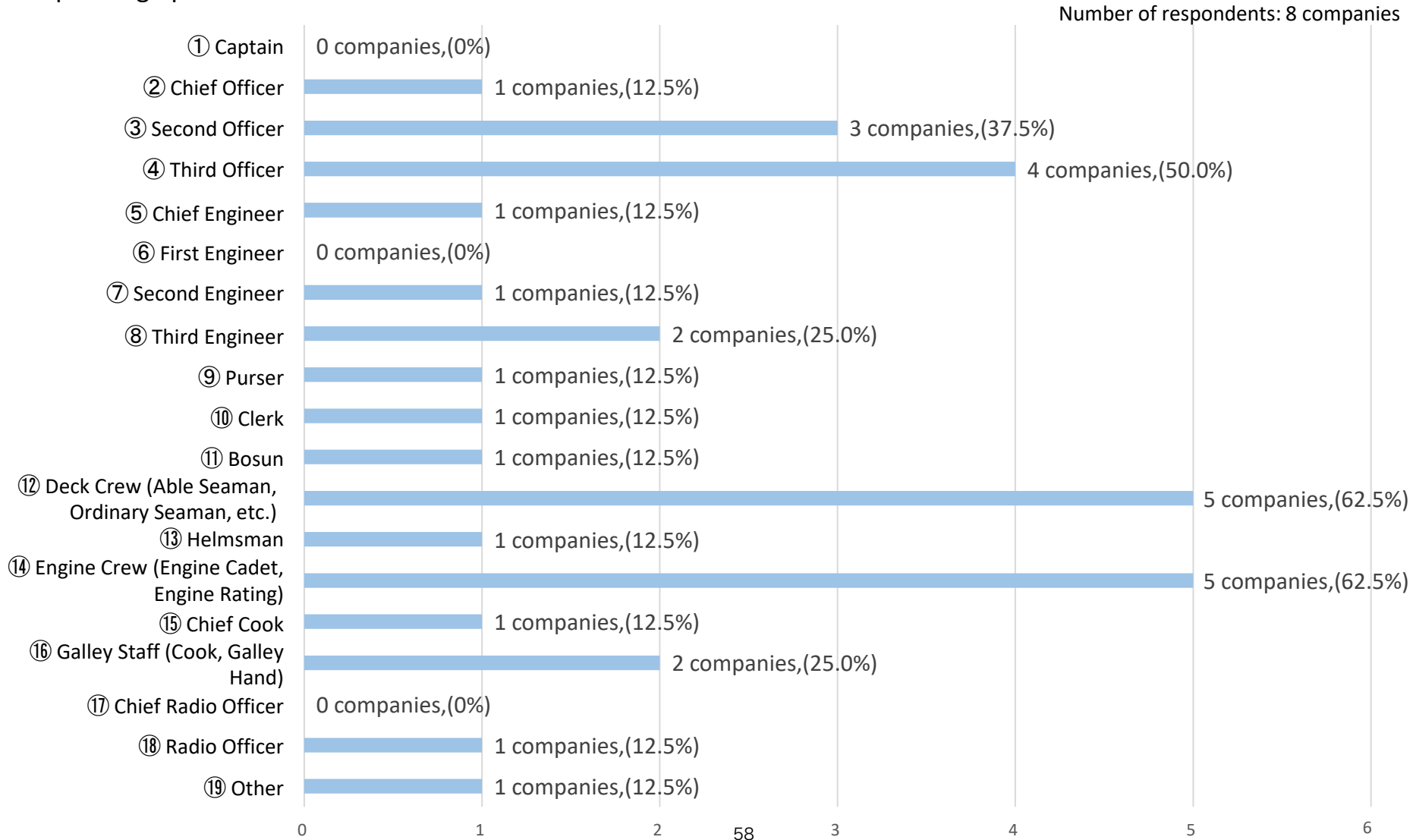
Number of respondents: 117 individuals



# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 1-5)(Responses from Shipping Companies)

(5) For those who selected "① Yes" in question (1), **please indicate the job positions of the seafarers who were victims of harassment or bullying.** Please select all applicable options. If multiple seafarers are involved, please select all corresponding options.



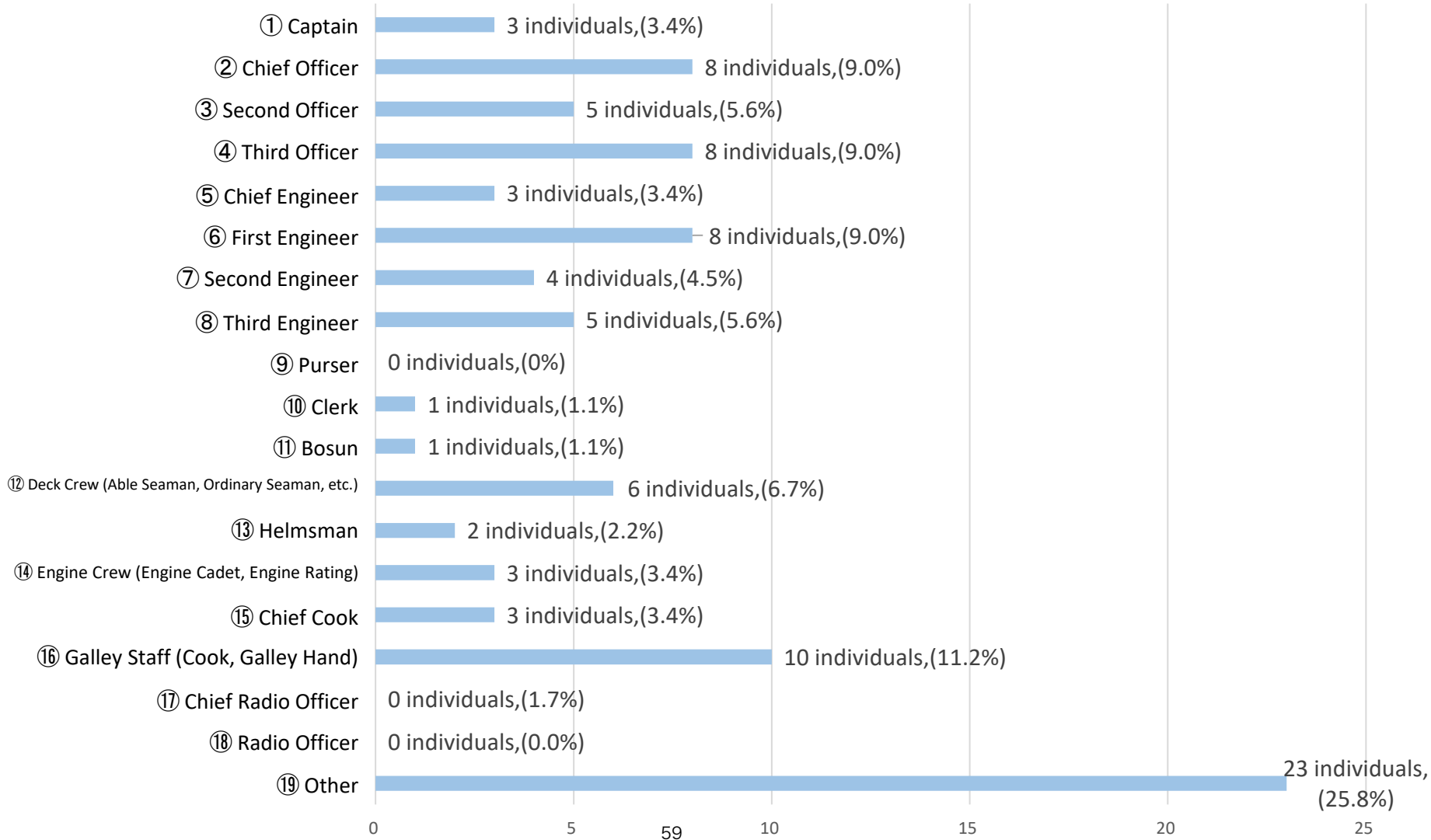
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 1-6)(Responses from seafarers)

(6) In the past three years, while on board, have you been subjected to comments or actions by other seafarers or your superiors that have caused you mental or physical strain or distress, or affected your psychological or physical health?

### Occupations of those who selected '① Yes' for the question in(2)

Number of respondents: 89 individuals



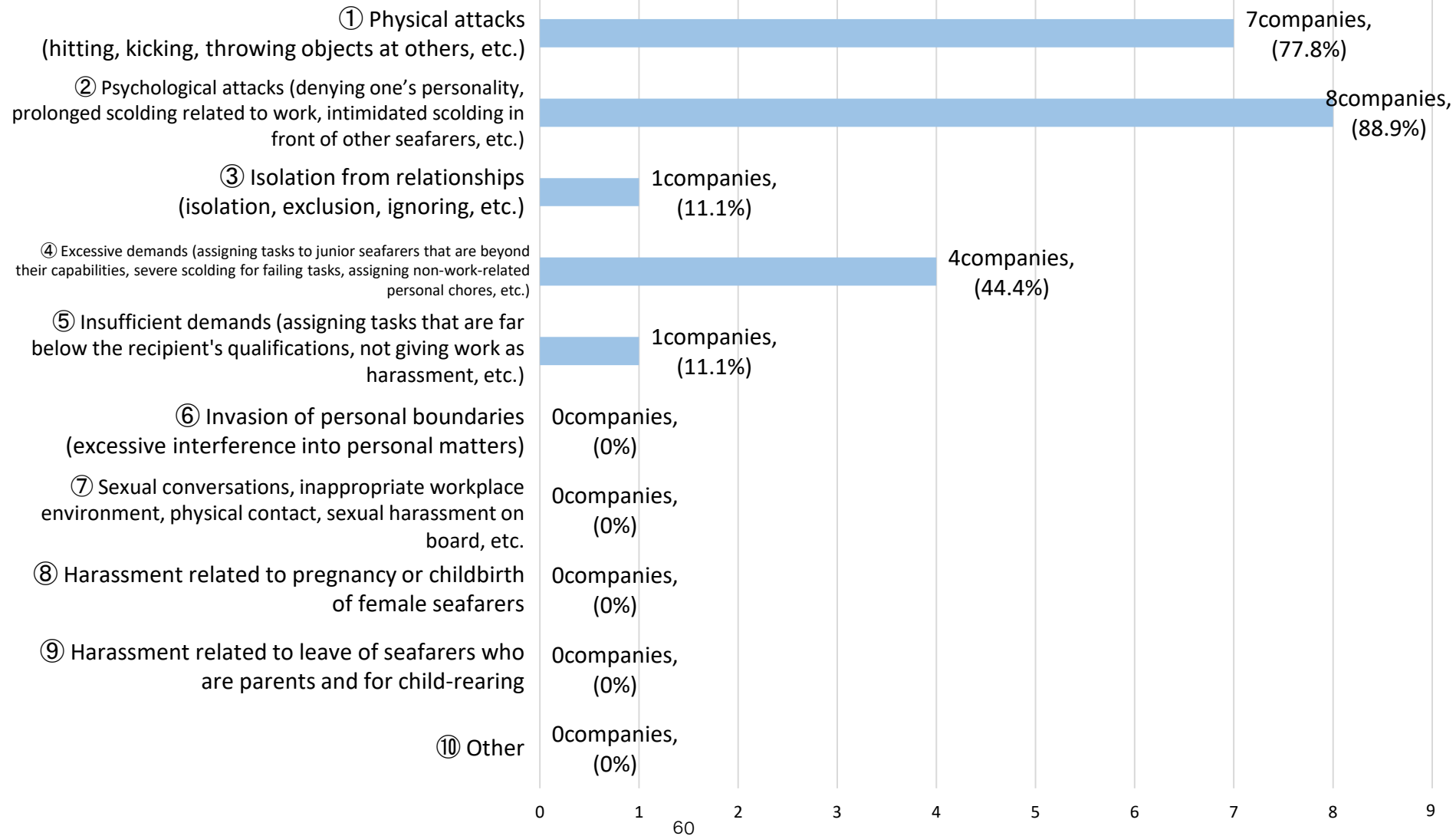
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 2-1)(Responses from Shipping Companies)

(7) For those who selected "① Yes" in question (1), please **specify the nature of the reports or complaints** filed by seafarers. Please select all applicable options.

If multiple incidents apply, please select all corresponding options.

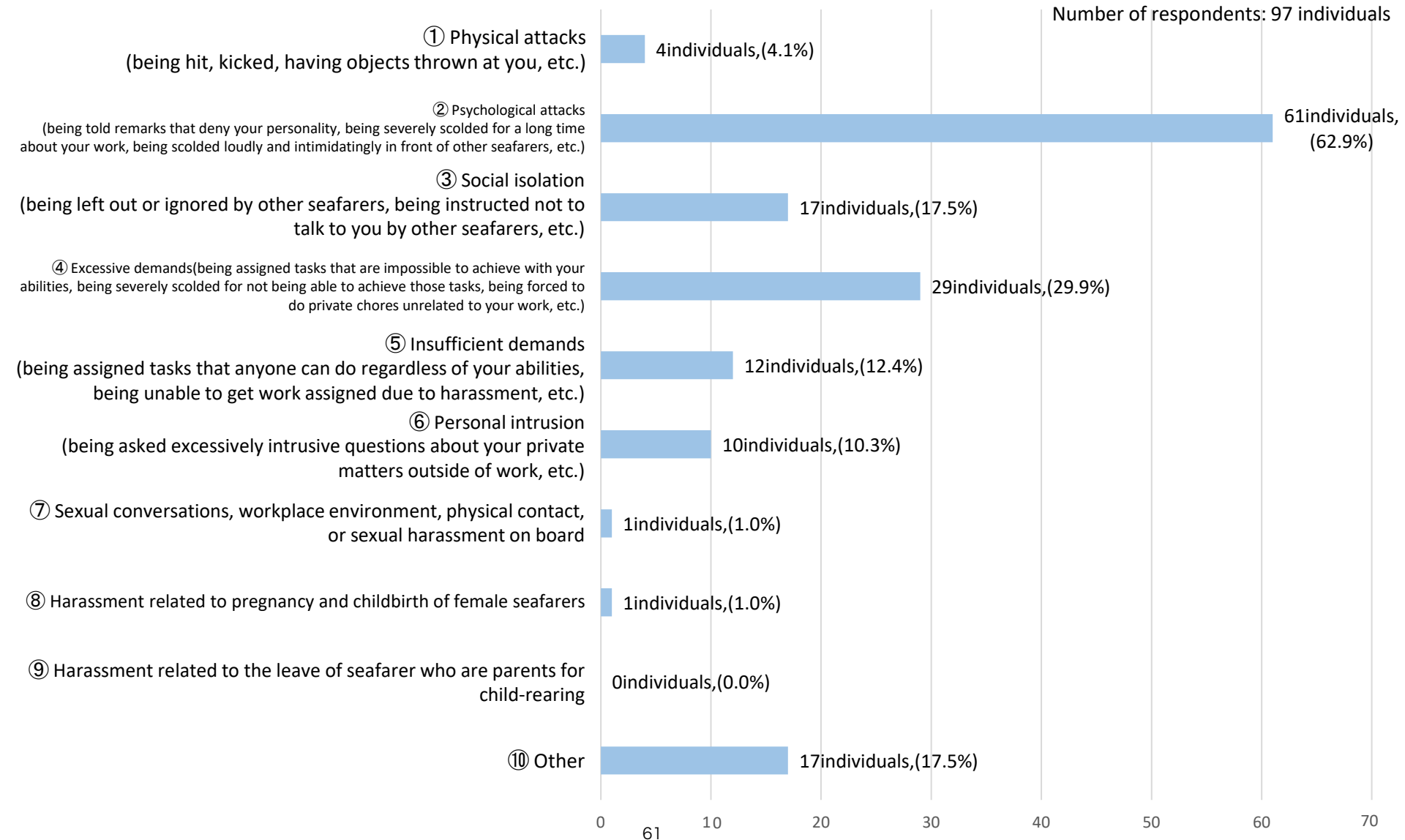
Number of respondents: 9 companies



# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 2-2)(Responses from seafarers)

(8) For those who selected "① Yes" in question (2), please specify **the types of remarks or actions you experienced**. If applicable, please specify the frequency. If none of the options apply or if it is unclear whether they apply, you may skip the question.



## Survey Results(Part 2-2)(Additional comments from seafarers)

(9) For those who selected "① Yes" in question (2), Please briefly describe the nature of those remarks or actions, within reasonable limits in the space below.

- boss around, pressured, bullied
- Be racially discriminated against, long time work without a break.
- Mainly verbal abuse or public humiliation
- Always yelling and always finding mistakes.
- Shouting and cursing
- Bullying and scolded in front of many individuals
- over power use
- Too much expectation that leads to overwhelming stress onboard
- a C/O bullied me daily because of my nationality
- My 1st Engineer have been giving me remarks that implied I am not competent enough. He have been picking on me every time.
- Psychological burden of being completely ignored by seniors while discussing any major issues and no appreciation for the work.
- Superior in office noted to frequently demean / demoralize seafarers onboard instead of being part of the onboard team, encouraging the team & helping the team.
- Some senior officer told me your slow and incompetent. The fact that they only got angry at you because they make it personal because you don't involve in their drinking session.

## Survey Results(Part 2-2)(Additional comments from seafarers)(continued)

(9) For those who selected "① Yes" in question (2), Please briefly describe the nature of those remarks or actions, within reasonable limits in the space below.

- Office pressing to do some jobs, which cannot be done. Too many papers for a single person. Increasing volume of paper-work from office and other companies. Crew change department not planning properly crew change in time.
- Chief Eng shouting and swearing at the crew members for a simple reasons. When unexpected problems appear instead of giving advice he was throwing spanners due to the lack of ideas how to cope with situation

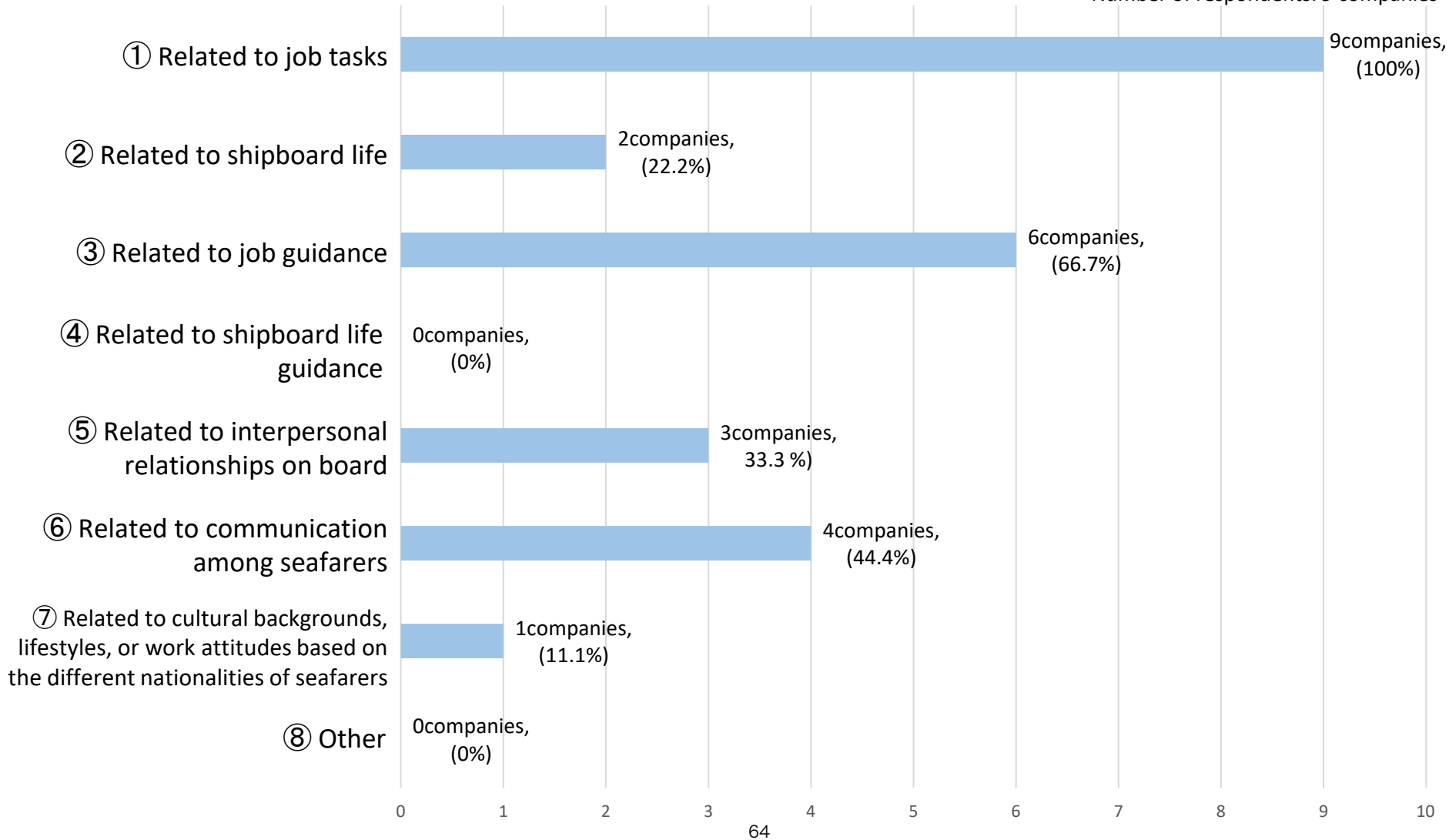
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 3-1)(Responses from Shipping Companies)

(10) For those who selected "① Yes" in question (1), please select **the relevant factors related to harassment and bullying** incidents at your company.

Please select all applicable options. If multiple causes apply, please select all corresponding options.

Number of respondents: 9 companies



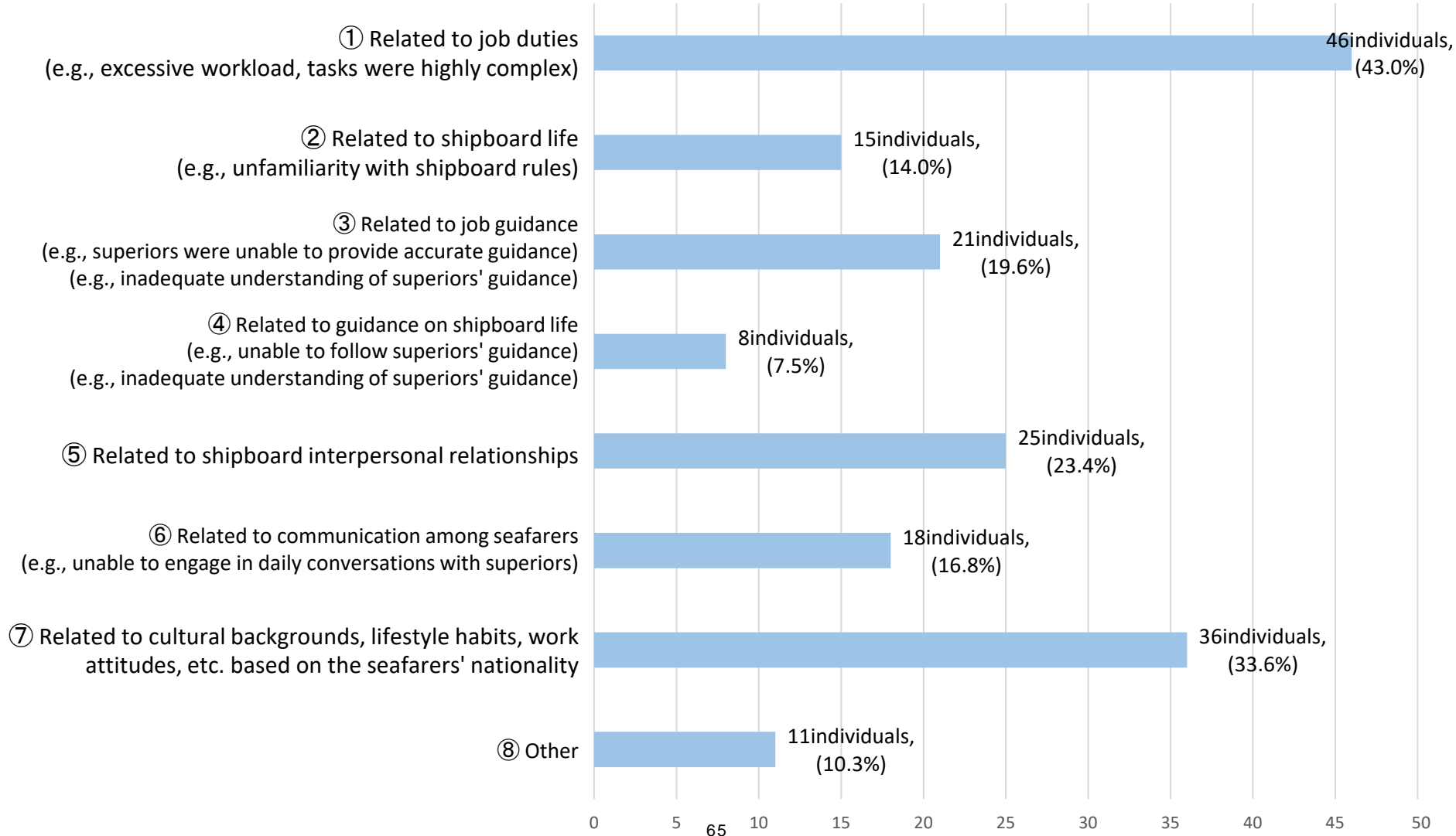
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 3-2)(Responses from seafarers)

(11)For those who selected "① Yes" in question (2), what do you believe to be **the causes or factors of your experience?**  
Please select all that apply.

If multiple options apply, please select all that apply.

Number of respondents: 107 individuals

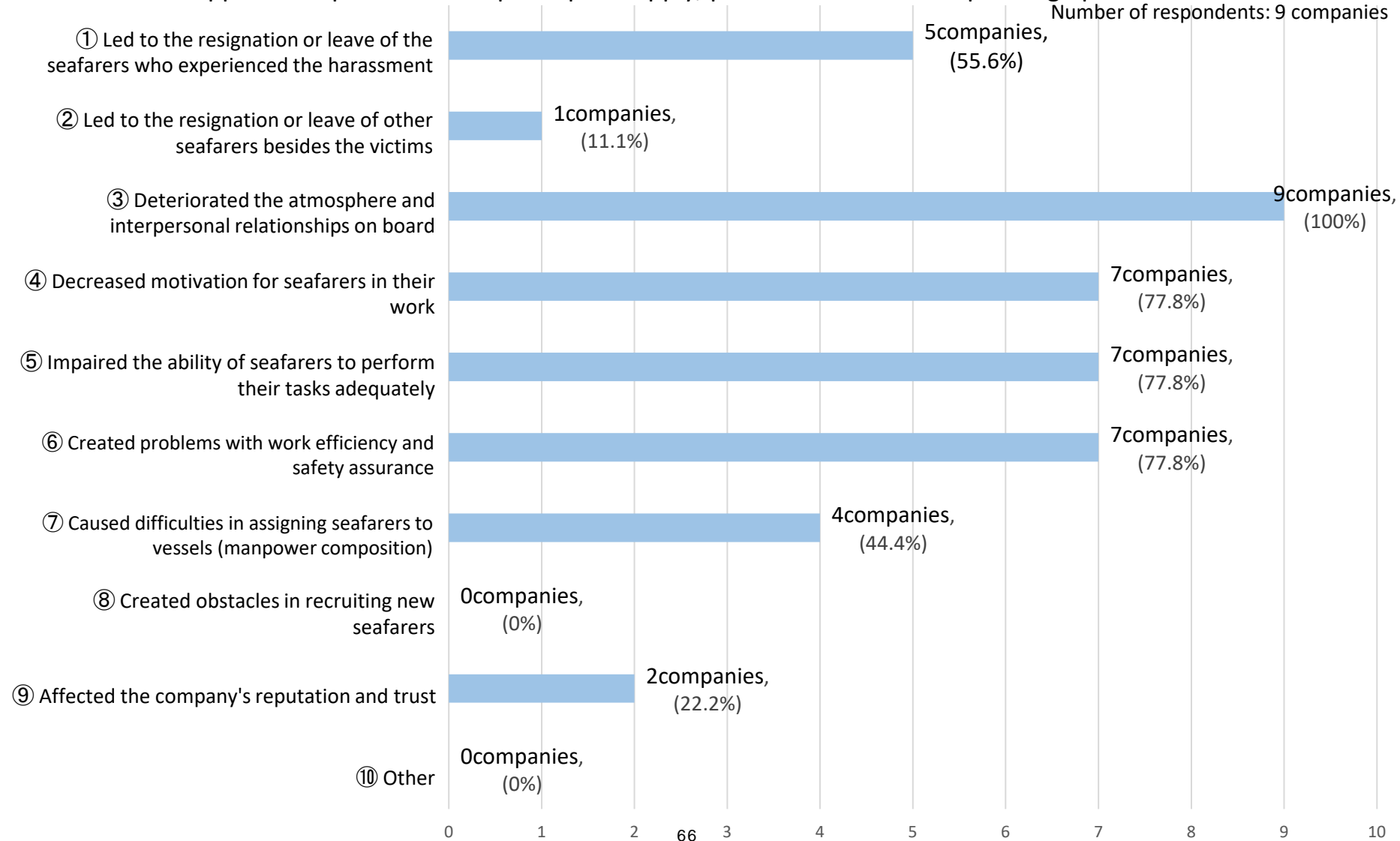


# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 4-1)(Responses from Shipping Companies)

(12) For those who selected "① Yes" in question (1), **what kind of impact did the harassment or bullying incidents have on work tasks and internal relationships?**

Please select all applicable options. If multiple impacts apply, please select all corresponding options.



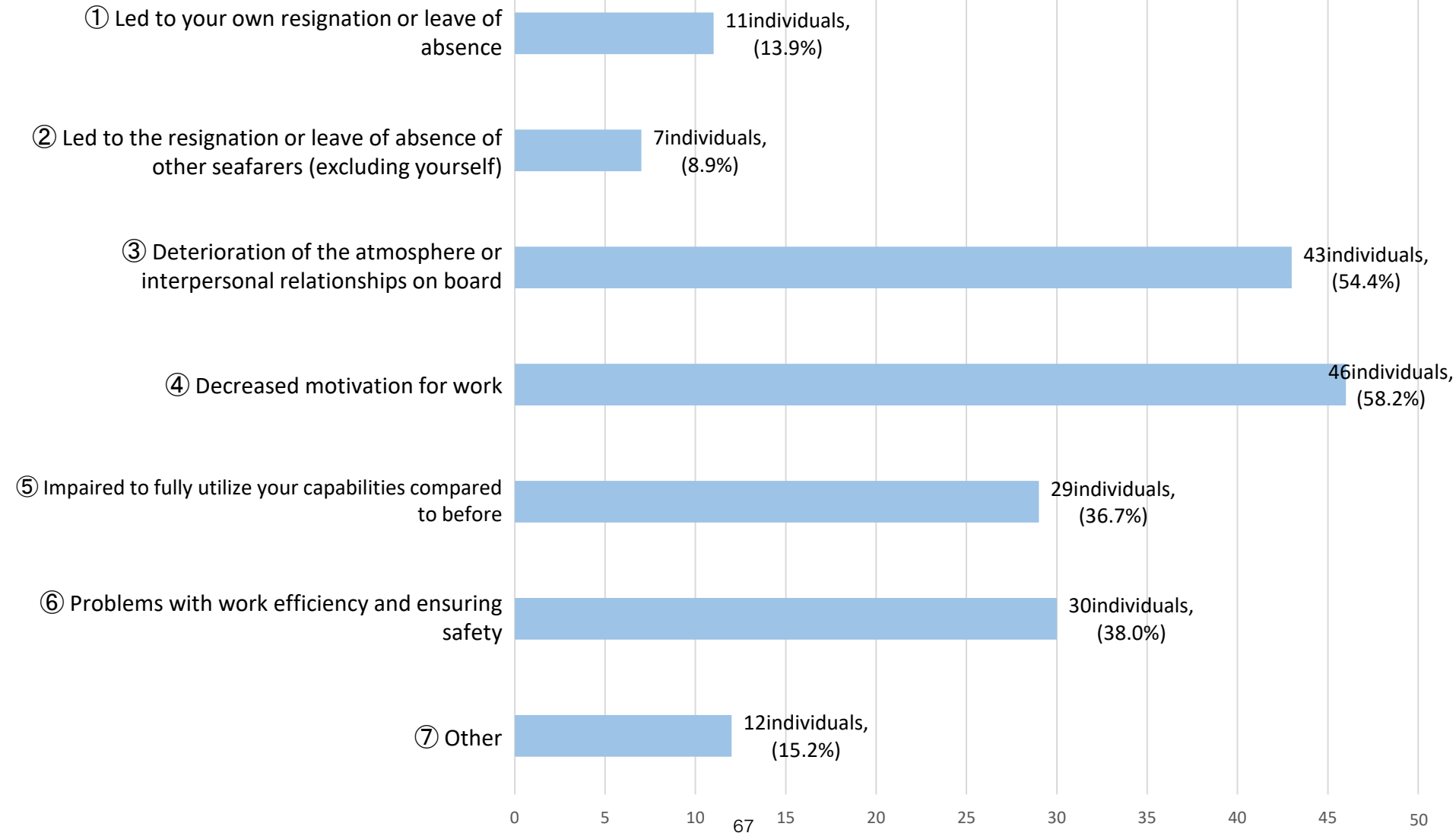
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 4-2)(Responses from seafarers)

(13) For those who selected "① Yes" in question (2), **what impact did the incidents you experienced have on your work or internal relationships?**

Please select all that apply. If multiple options apply, please select all that apply.

Number of respondents: 79 individuals



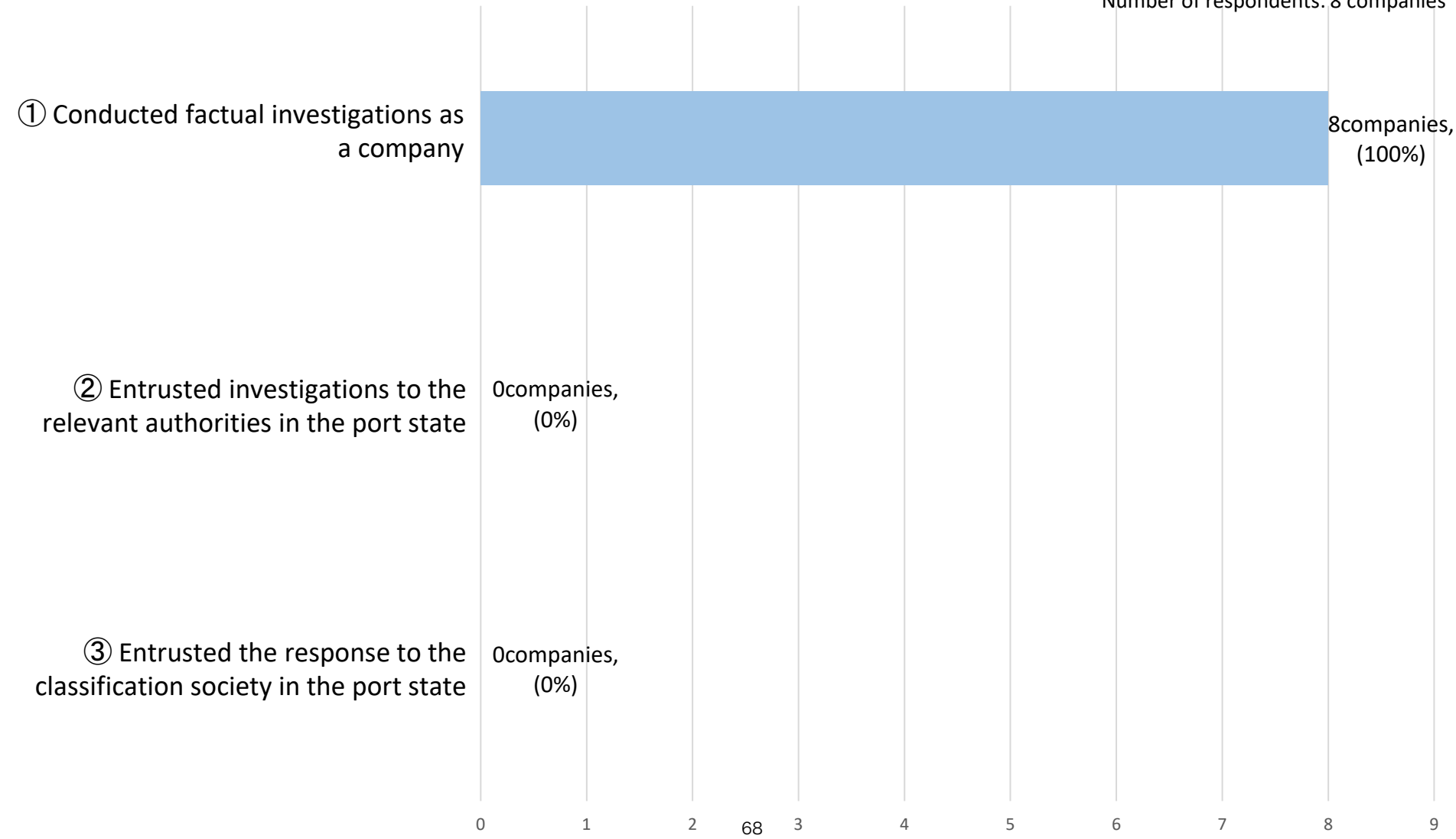
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 5-1)(Responses from Shipping Companies)

(14) For those who selected "① Yes" in question (1), **how did you handle the reports or complaints of harassment or bullying from seafarers?**

Please select all applicable options.

Number of respondents: 8 companies



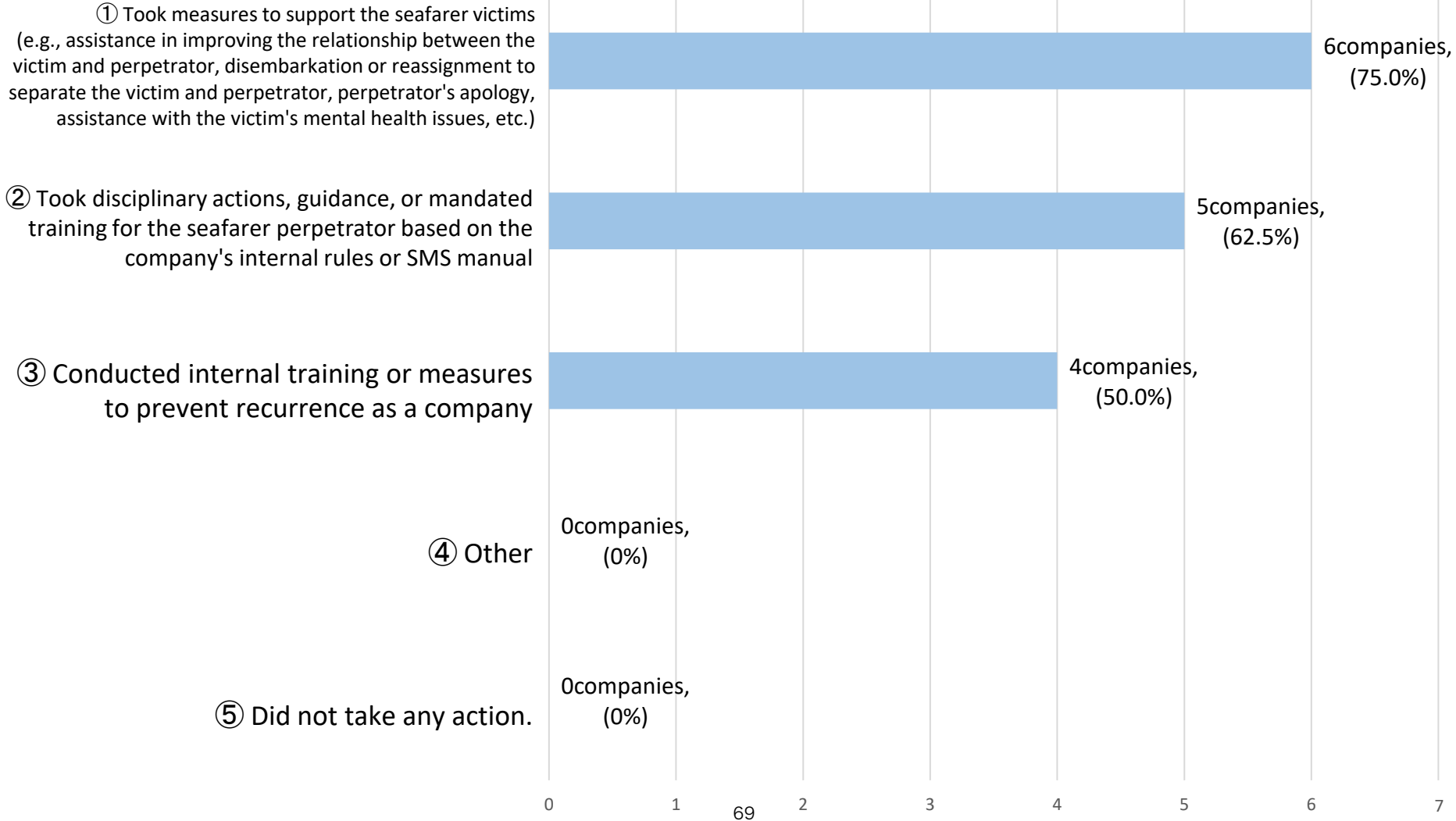
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part5-2)(Responses from Shipping Companies)

(15) For those who selected "① Conducted factual investigations as a company" in question (14), **what actions did you take when harassment or bullying was confirmed as a result of the factual investigations?**

Please select all applicable options. If multiple measures were taken, please select all corresponding options.

Number of respondents: 8 companies



# Summary of Survey Results on Bullying Harassment onboard

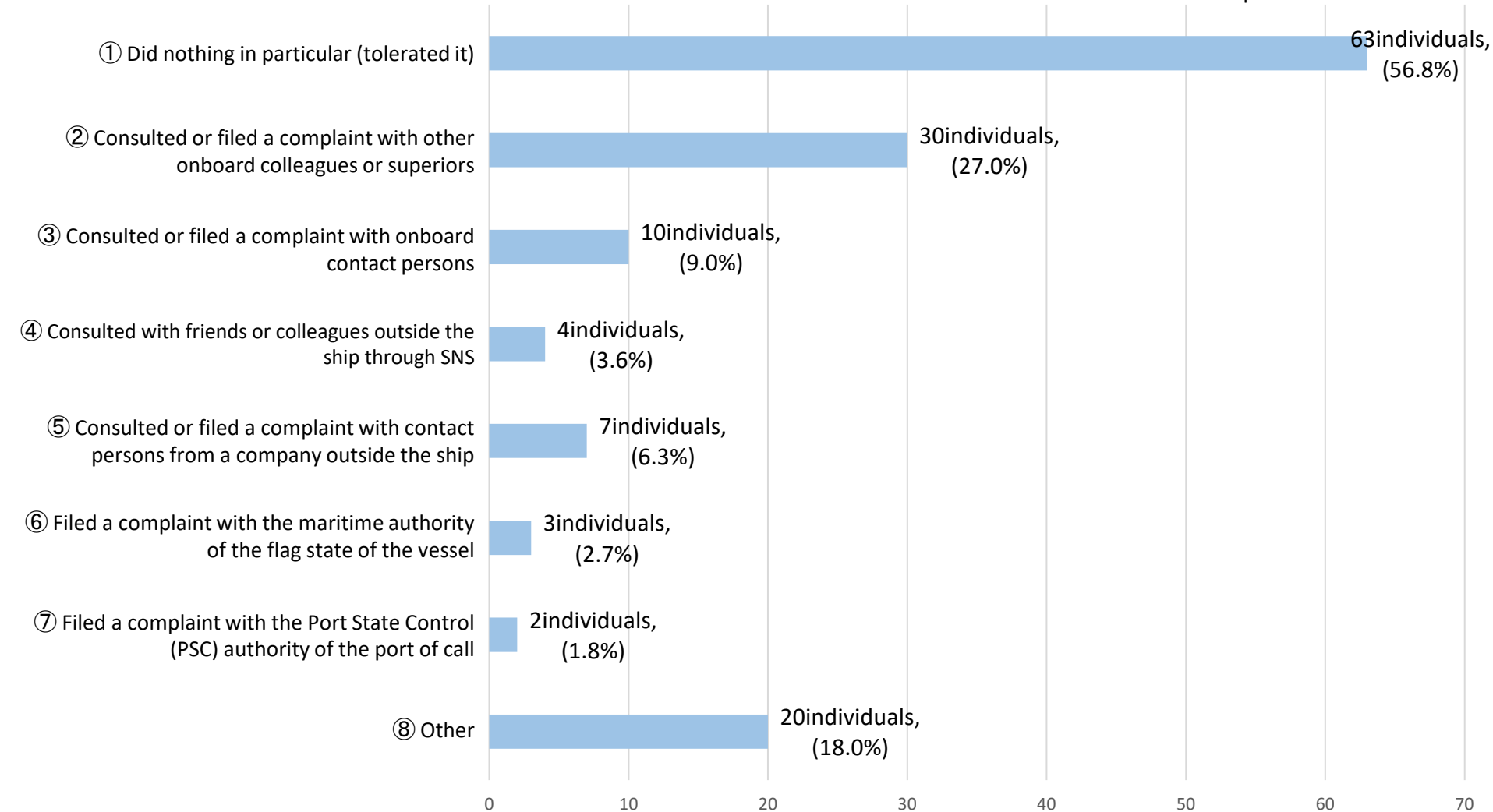
## Survey Results(Part5-3)(Responses from seafarers)

(16) For those who selected "① Yes" in question (2), **how did you respond to the issue?**

Please select all that apply.

If multiple options apply, please select all that apply.

Number of respondents: 111 individuals

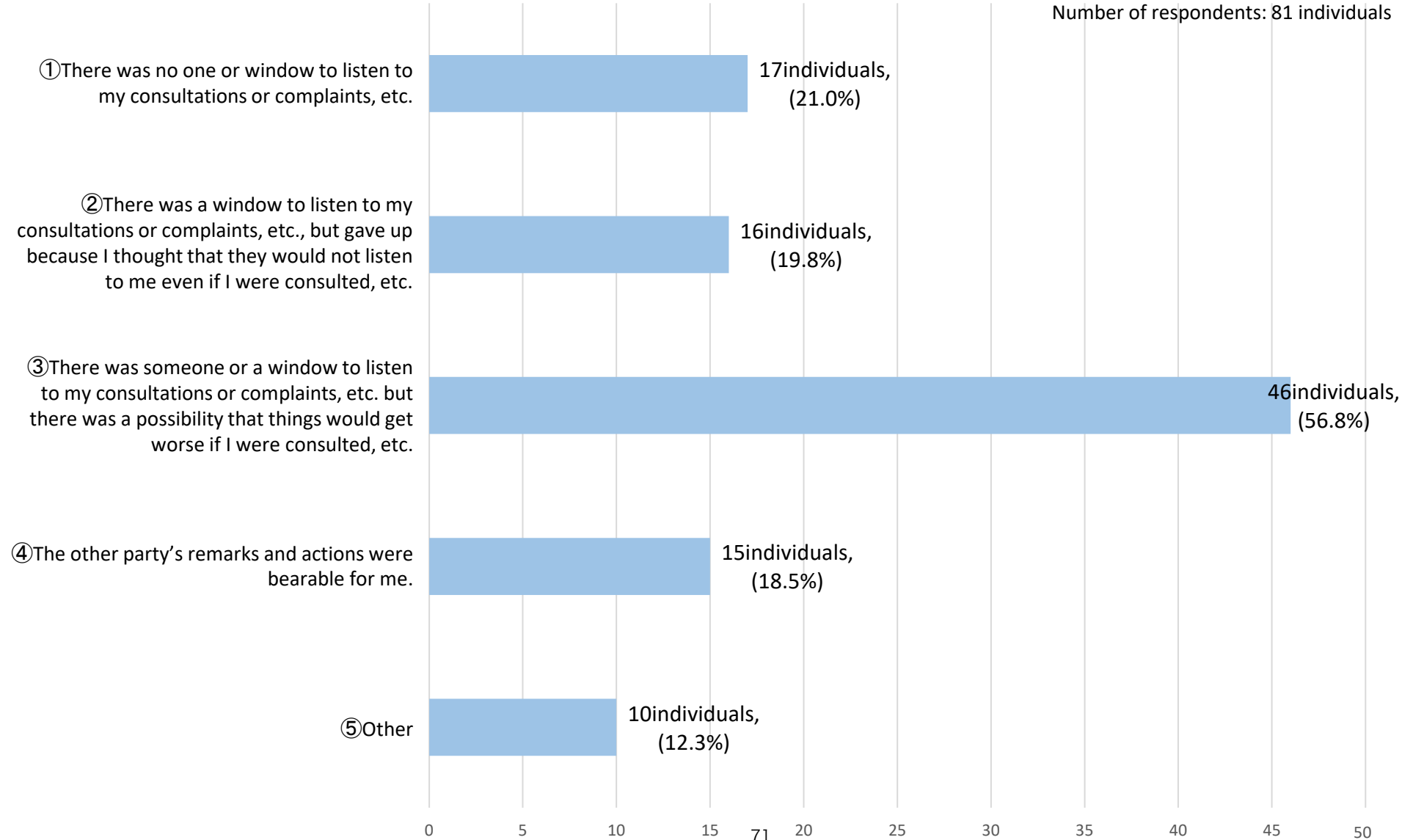


# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 5-4)(Responses from seafarers)

(17) For those who selected '**① Did nothing in particular (tolerated it)**' in question (16). Please select the reason for this. If there are multiple applicable items, please select all that apply.

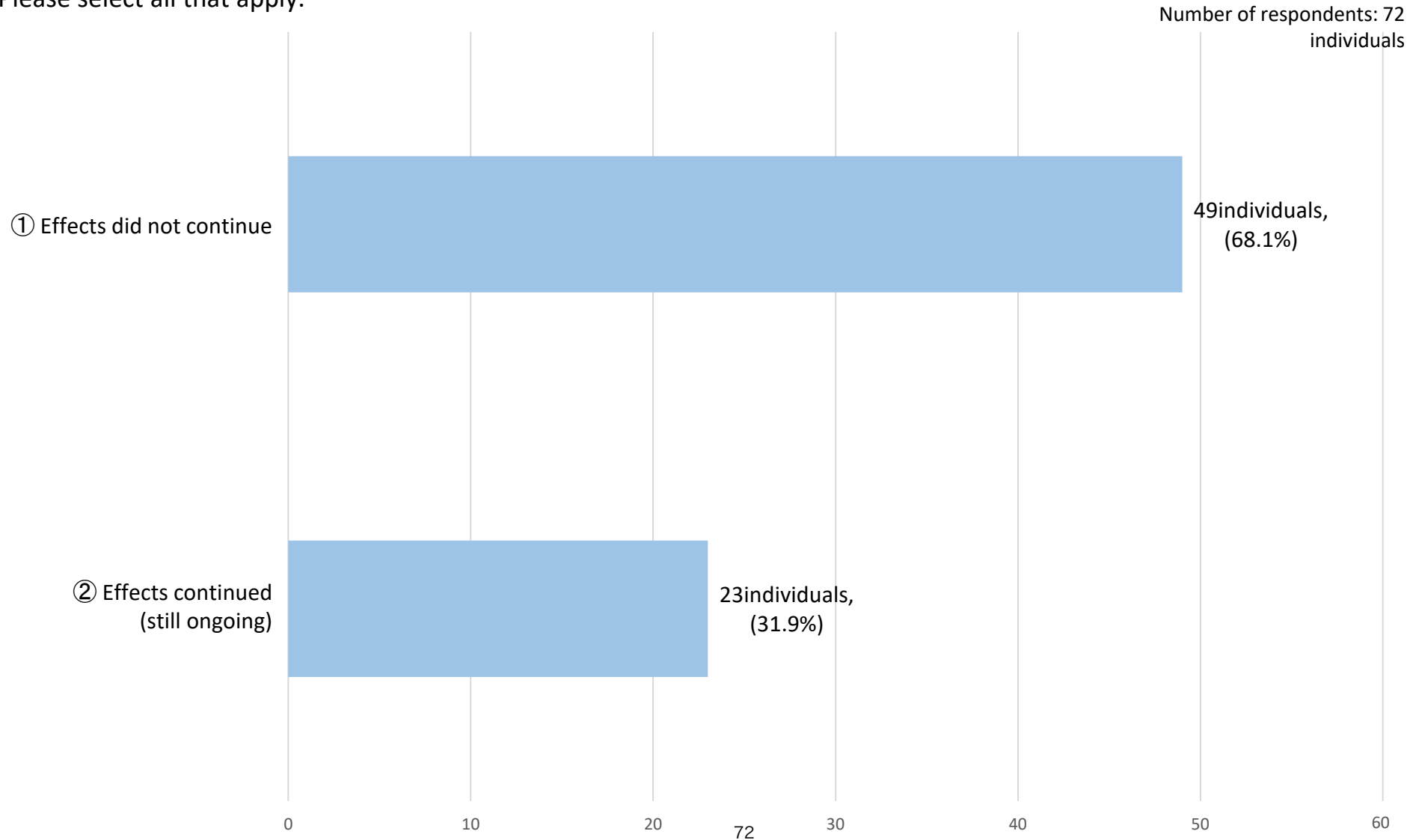
Number of respondents: 81 individuals



# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 6-1)(Responses from seafarers)

(18) For those who answered "① Yes" in question (2), please **select the effects of the incidents during the voyage** on your psychological or physical well-being after disembarking.  
Please select all that apply.



# Summary of Survey Results on Bullying Harassment onboard

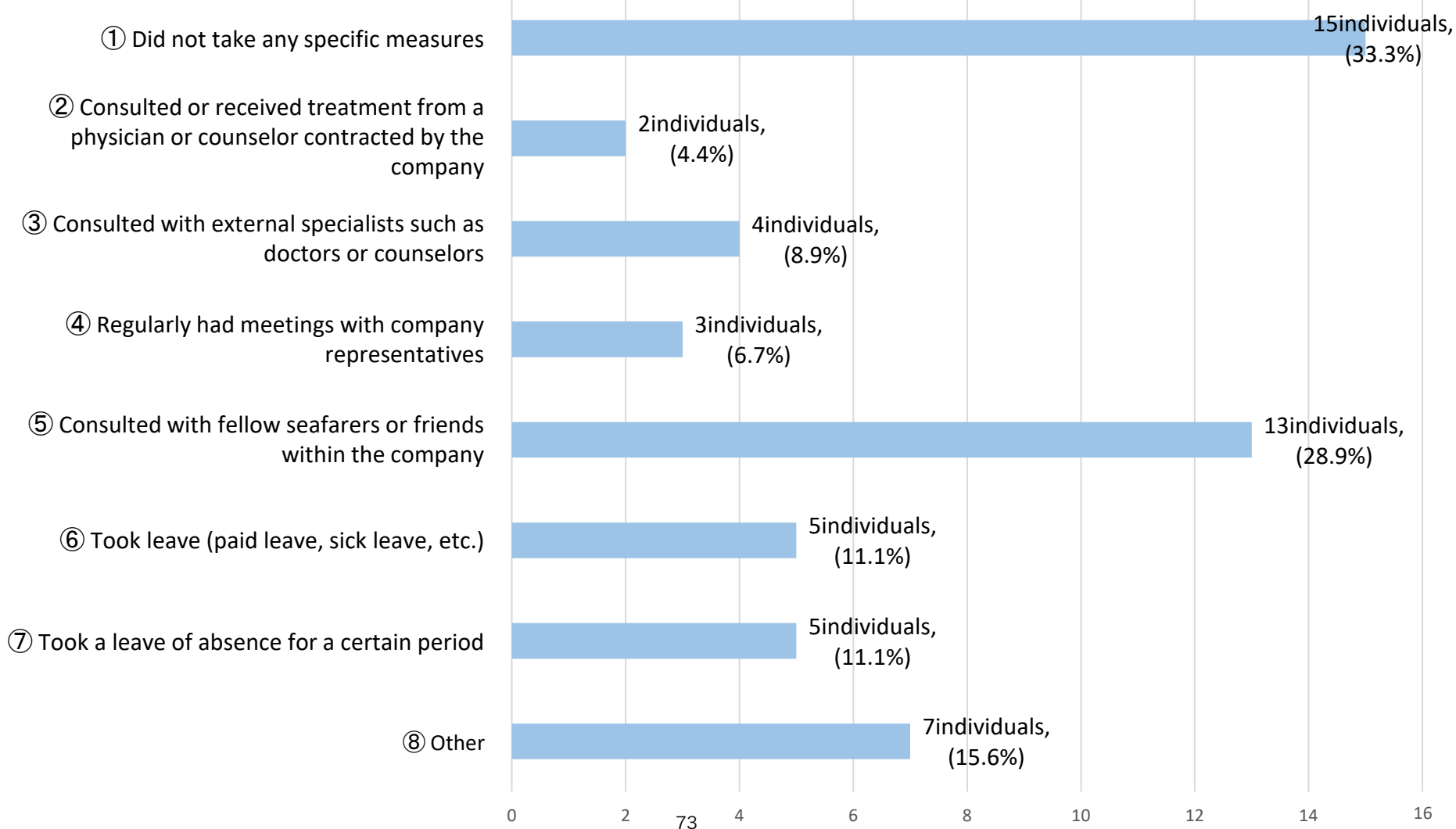
## Survey Results(Part 6-2)(Responses from seafarers)

(19) For those who selected "② Effects continued (still ongoing)" in question (18), **please select the measures you took to alleviate your psychological or physical distress.**

Please select all that apply. If multiple options apply, please select all that apply.

Number of respondents: 45 individuals

※If answering this question would cause you distress or anxiety, feel free to skip it.



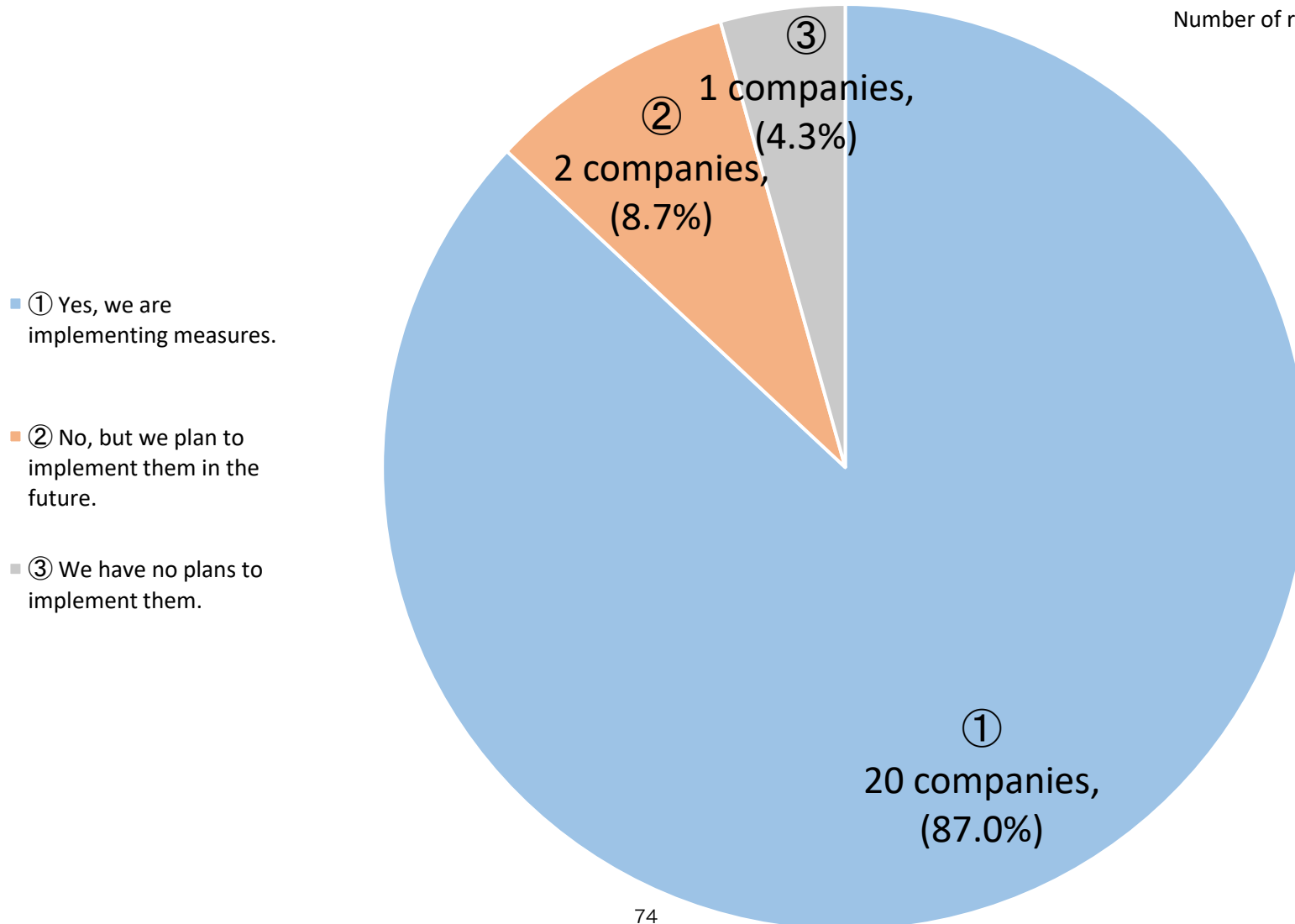
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 7-1)(Responses from Shipping Companies)

(20) **Does your company take measures to address and prevent harassment and bullying?**

Please select the applicable option

Number of respondents: 23 companies



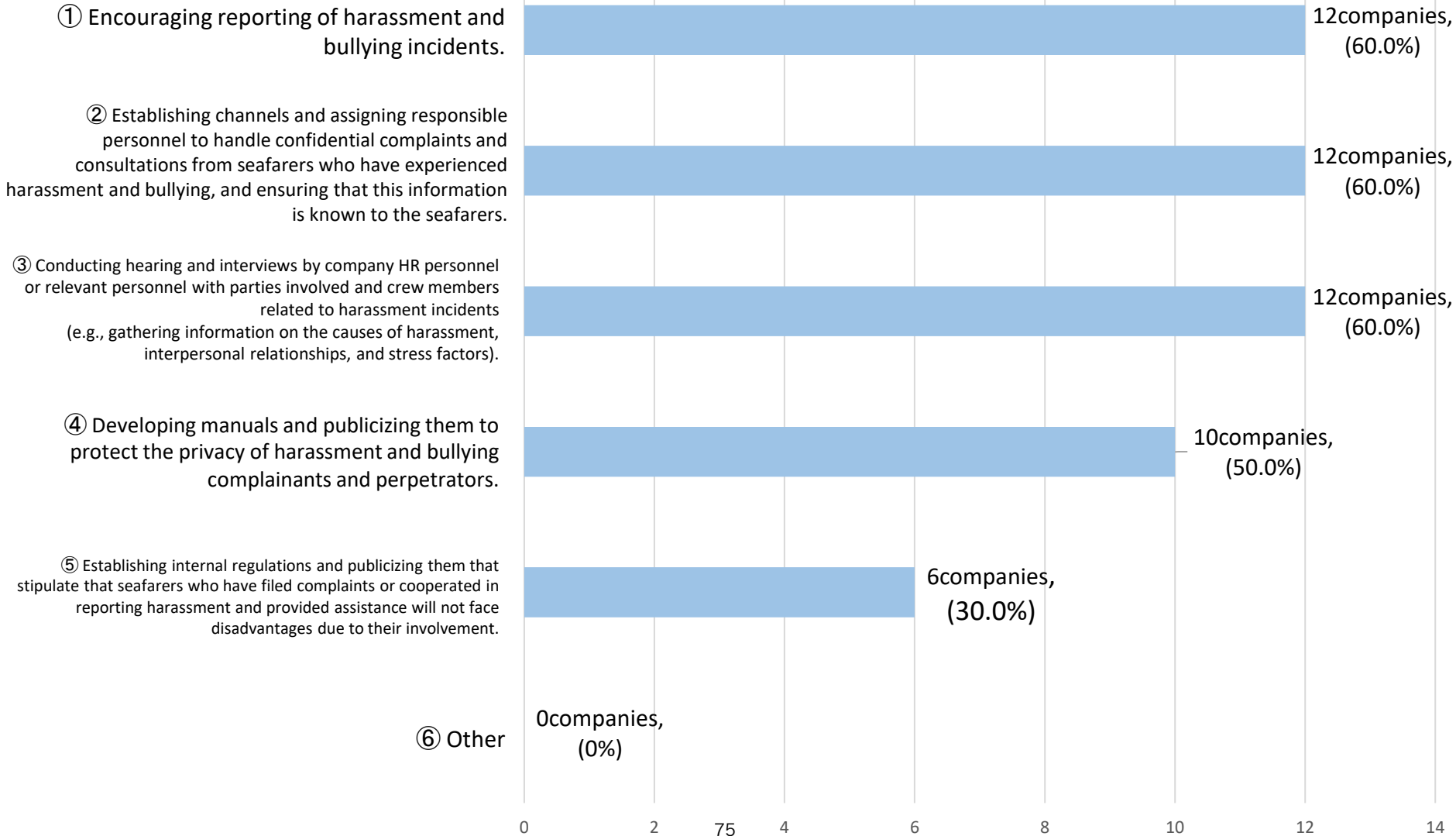
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 7-2)(Responses from Shipping Companies)

(21) For those who selected "① Yes, we are implementing measures" in (20), please **choose the measures that your company has implemented to address incidents of harassment and bullying.**

If multiple measures apply, please select all that apply.

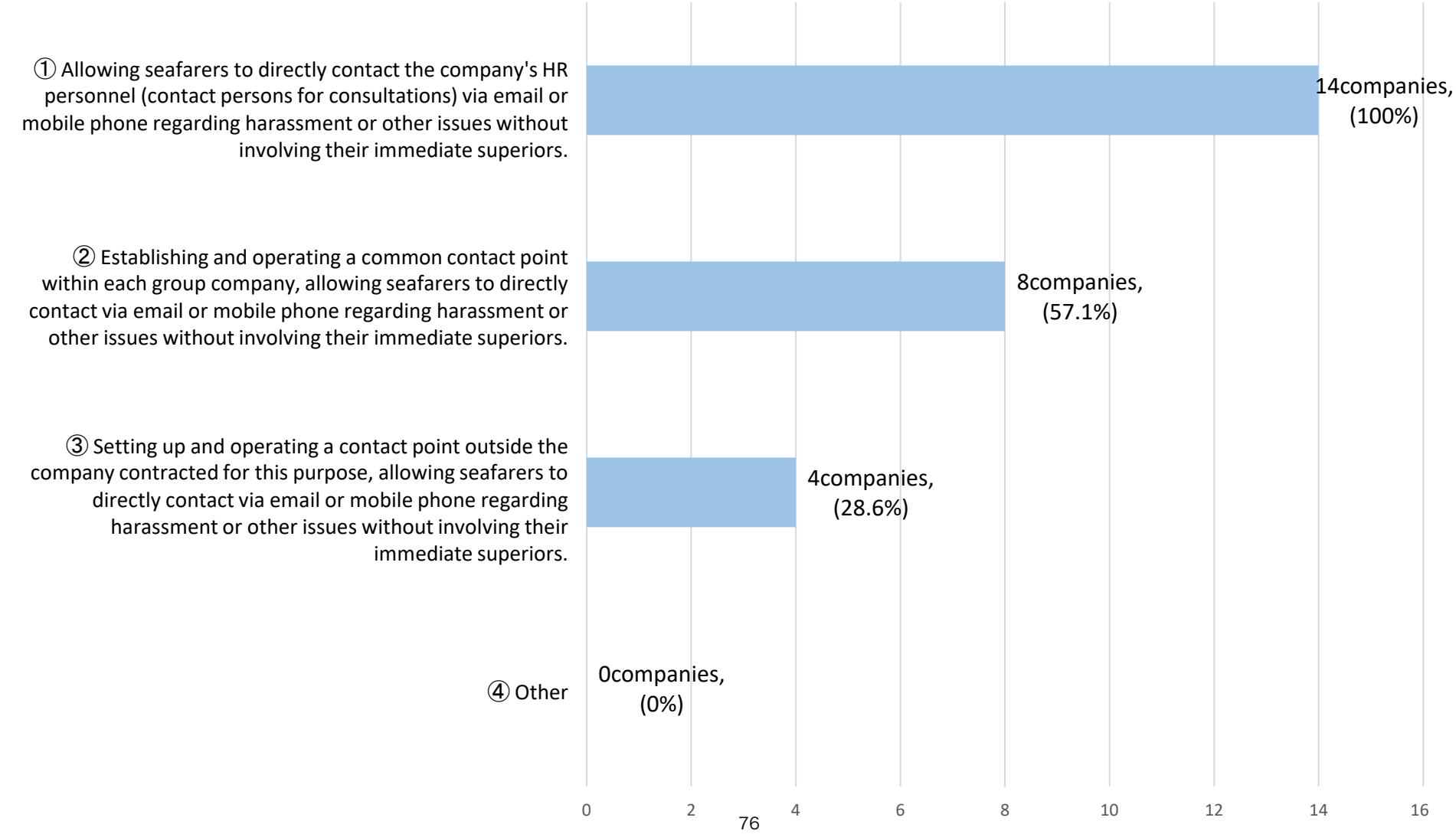
Number of respondents: 20 companies



## Survey Results(Part 7-3)(Responses from Shipping Companies)

(22) For those who selected "② Establishing channels and assigning responsible personnel to handle confidential complaints and consultations from seafarers who have experienced harassment and bullying, and ensuring that this information is known to the seafarers" in (21), **how do you facilitate easy access for seafarers?**

Please select the applicable options.If multiple options apply, please select all that apply Number of respondents: 14 companies



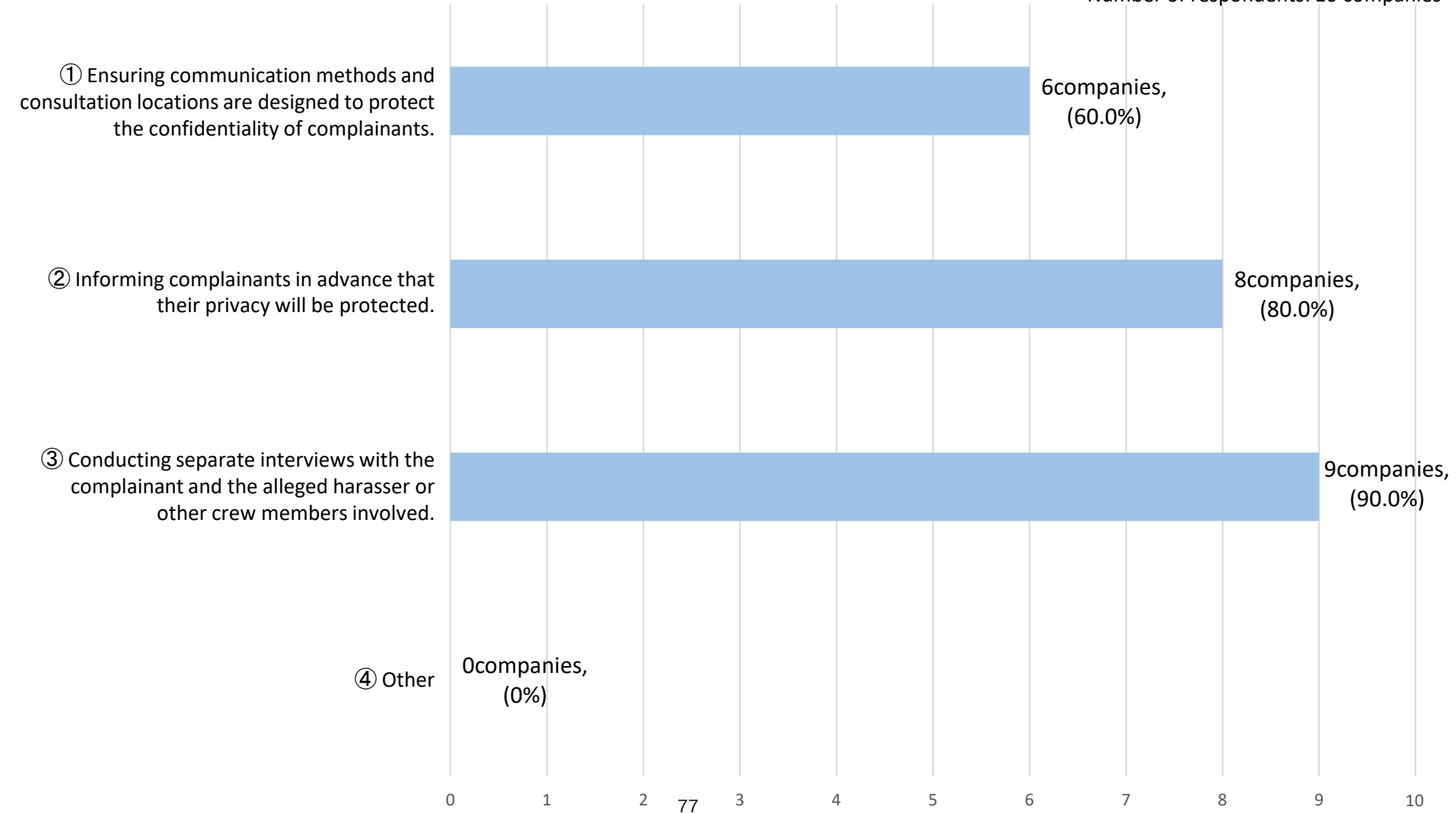
# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 7-4)(Responses from Shipping Companies)

(23) For those who selected "④ Developing manuals and publicizing them to protect the privacy of harassment and bullying complainants and perpetrators" in (21), **what measures do you take to protect the privacy of individuals involved in harassment and bullying cases** reported by seafarers?

Please select the applicable options. If multiple options apply, please select all that apply.

Number of respondents: 10 companies



# Summary of Survey Results on Bullying Harassment onboard

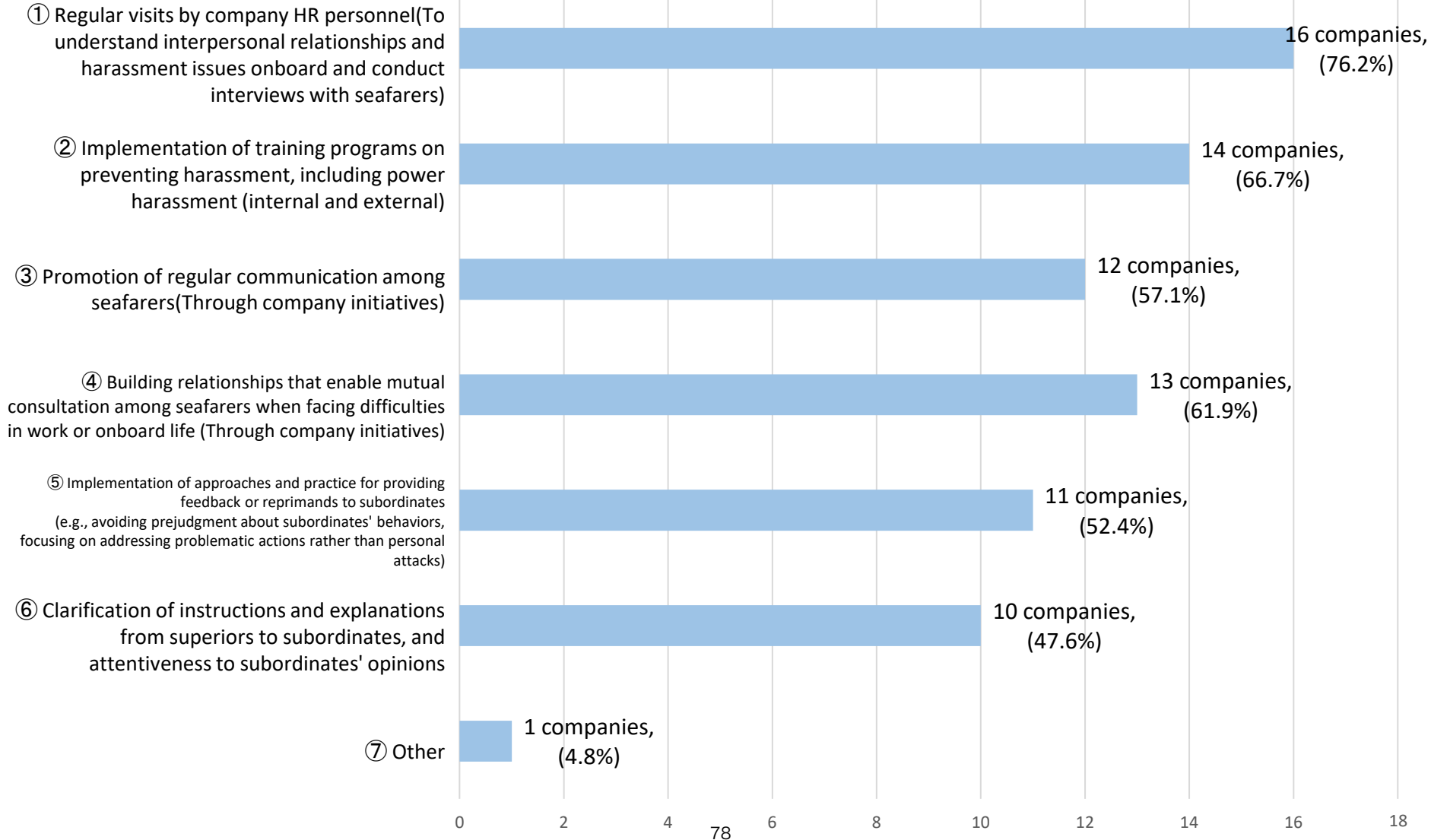
## Survey Results(Part 7-5)(Responses from Shipping Companies)

### (24) Measures Deemed Necessary for Preventing Harassment and Bullying in Maritime Employment

Please select the measures you consider necessary. If multiple options apply, please select all that apply.

Additionally, if there are any other measures you consider necessary, please provide details.

Number of respondents: 21 companies



# Summary of Survey Results on Bullying Harassment onboard

## Survey Results(Part 7-6)(Responses from seafarers)

(25)This question is for everyone.

**What measures do you believe are necessary to prevent harassment and bullying?**

Please select all that apply. If multiple options apply, please select all that apply.

Number of respondents: 556 individuals

