



**Guide for preventing
inappropriate treatment,
harassment and sexual
harassment in the
FILM AND TV INDUSTRY**

English version

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Also available in
Finnish and Swedish







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The film and television industry does not accept inappropriate treatment or any form of harassment at work or in connection with recruitment or education. Everyone working in the industry is responsible for the atmosphere in and well-being of their work community, and everyone has the right to be treated appropriately. Creative work does not make inappropriate behaviour, treatment or harassment acceptable.

This guide provides instructions for those encountering inappropriate behaviour, employers and other persons acting as supervisors as well as those accused of such behaviour. The goal is to promote early and effective intervention in inappropriate treatment, harassment and sexual harassment at work.

This guide does not replace workplace- or production-specific practices. Instead, the guidelines are intended to support those working in the film and television industry.



What is inappropriate treatment and harassment?

Harassment and inappropriate treatment are actions and behaviour at work that violate the Occupational Safety and Health Act. Any member of the work community may be guilty of it either alone or together with others. It may target both employees and supervisors.

Inappropriate treatment includes:

- continuous and unjustified criticism of a person's work performance, defamation or, for example, excluding them from the work community
- inappropriate verbal conduct, such as name-calling, intimidation or invalidation
- negative comment abouts one's body, e.g., commenting on weight and appearance
- misuse of the right to direct, such as issuing orders in a humiliating manner, unlawful modification of working conditions or purposefully not sharing information.

Inappropriate treatment may include other types of inappropriate conduct, and legislation offers no clear definition. Inappropriate treatment may also meet the criteria for harassment.

Harassment includes:

- inappropriate treatment that may pose a risk or hazard to the safety or health of an individual
- behaviour that violates general good manners, is inappropriate at work and disrupts the work
- offensive behaviour or treatment in words and actions

- creating a threatening, humiliating or distressing atmosphere at the workplace.

Harassment is often systematic and continuous, but it may also be a singular event. Harassment may also be sexual in nature. Harassment does not include the processing of problems in the work community, intervention in work performance for justified reasons, referral to an assessment of working ability or issuing a warning.

Read more (available in Finnish): [Elokuva- ja tv-tuotantoalan työturvallisuusopas, Työturvallisuuskeskus](#)

What constitutes sexual and gender-based harassment?

The Act on Equality between Women and Men (Equality Act) defines and prohibits sexual or gender-based harassment. In practice, the scope of the Act is broader than equality between women and men, as the Act also aims to prevent discrimination and harassment based on gender identity or gender expression.

If harassment or other inappropriate treatment of an employee occurs at work and causes risk or hazard to the employee's health, the employer, after becoming aware of the matter, shall by available means take measures for remedying this situation. (Chapter 5, Section 28 of the Occupational Safety and Health Act)

Sexual harassment refers to unwanted physical, verbal or other behaviour of a sexual nature. Sexual harassment includes:

- physical touching
- proposals for or demands of sexual interaction
- sexually suggestive gestures or expressions
- vulgarity, humour that uses double entendres and remarks or questions about one's body, clothing or private life
- materials, messages or phone calls of a sexual nature
- in the most extreme case, rape or attempted rape.

The legal term sexual harassment:

- is an offence involving sexual harassment and is therefore punishable under the Criminal Code
- refers to an act that violates the right to sexual self-determination, and may be physical, or verbal or another act comparable to such

- after the reform of the legislation on sexual offences, may also involve sending or showing a message or picture, taking a picture or exposing oneself to another person.

Gender-based harassment refers to unwanted behaviour related to a person's gender, which is not sexual in nature. Gender-based harassment includes:

- degrading and negative comments about a person's gender, gender identity or gender expression
- depreciating a person's gender, gender identity or gender expression
- workplace bullying when it is based on the victim's gender, gender identity or gender expression.

Read more (available in Finnish): [Elokuva- ja tv-tuotantoalan työturvallisuusopas, Työturvallisuuskeskus](#)

Special features of the film and television industry

- Irregular working hours and working conditions may blur the lines between professional and personal. It is particularly important to pay attention to this boundary, and people's right to self-determination should always be respected.
- As a rule, power structures hinder individuals' ability to express themselves; especially those in an official or informal position of power must pay attention to their behaviour.
- In the audiovisual sector, members of working groups may conduct very public work. If an employee is harassed, threatened or slandered in public or social media in matters related to work, they should not have to deal with the situation alone.

Preventive measures

The employer must define measures to prevent inappropriate treatment, harassment or sexual and gender-based harassment in productions.

The first step in preventing harassment is that the employer familiarises themselves with the employer's obligations. Training both supervisors and employees on the topic and the relevant measures is critical.

Preventive measures include:

- a clear statement by the management that inappropriate behaviour or harassment in any form is not accepted at the workplace (zero tolerance)
- a clearly designated person in each production who may be notified of any observations related to harassment
- procedures established in the company in advance to address any harassment consistently and effectively
 - The workplace should have common guidelines describing how to make the workplace as safe as possible for everyone and how to act in case of a conflict. It is recommended that the workplaces create customised guidelines for safer spaces. These guidelines should be discussed together with the employees.
 - The rules of good conduct at work: discussing what is appropriate and what is not with employees.
- preparing an equality plan that shows how harassment is prevented and how to act in case of harassment. For example, WIFT's (Finland's Women in Film and Television) equality and

non-discrimination tool could be useful in creating a production-specific plan.

- Under the Equality Act, if an employer regularly has a personnel of over 30 employees, the employer shall prepare a gender equality plan at least every two years.
- the employer familiarising themselves with the Occupational Safety and Health Act, especially sections:
 - Employers' general duty to exercise care (Section 8) stating that employers have a duty to take care of the safety and health of their employees while at work by taking the necessary measures. In addition, employers shall continuously monitor the working environment, the state of the work community and the safety of the work practices.
 - Creating an occupational safety and health policy (Section 9) and analysis and assessment of hazards at work (Section 10).
- training supervisors to detect, investigate and eliminate inappropriate treatment, harassment and sexual harassment

The Equality Act (Section 6c) states that authorities, education providers and other bodies providing education and training as well as employers are obliged to take pre-emptive action in a purposeful and systematic manner against all discrimination based on gender identity or gender expression.

- establishing a confidential reporting channel. The EU whistleblowing directive, which has been implemented by the national Whistleblower Act, obliges all organisations employing at least 50 employees on a regular basis to set up their

own confidential reporting channel to report illegal activities. The Act does not prevent the reporting system from being used for abuses outside the scope of the Act, such as harassment.

Examples of preventive measures in the film and television industry

- The circumstances of recruitment and casting situations (link available in Finnish) must be created in such a way that the opportunities for harassment in all forms are minimal, for example, by ensuring the availability of suitable facilities for the event and the necessary third parties.
- The special characteristics of the production must be reviewed at the beginning of the production: for example, if it involves intimate scenes or improvisation, these situations should be reviewed in advance and the participants should be asked to consent. It is recommended to use an intimacy coordinator.
- The project-based nature of the industry and competing for jobs may make it more difficult to report shortcomings. However, it is critical to intervene in a preventive manner and to encourage people to report shortcomings even if the employment relationship has ended.

Guidelines for persons encountering inappropriate treatment, harassment and sexual harassment

Although the situation may feel difficult, try to take one or more of the actions below:

- record the time and place of the situation, what happened and who was present
- clearly and unambiguously inform the harasser immediately that you do not accept their behaviour and demand them to stop
- you may also ask a colleague, occupational safety and health representative or an employee representative for help and

ask the harasser to stop together

- notify your supervisor
- students and trainees: immediately contact the supervisor of your work placement and, if the situation persists, your educational institution.

If inappropriate treatment, harassment and sexual harassment still continue:

- record how and how often harassment occurs and how you have acted

● contact your immediate supervisor or the harasser's supervisor and ask them to handle the matter. If your supervisor harasses you, contact the supervisor's supervisor; also explain that you want to know what action the supervisor intends to take.

○ If necessary, also contact your occupational health care provider, occupational safety and health representative, employee representative or your union.

● if your employer does not take action to stop harassment or the measures are inadequate, you may ask the occupational safety and health authority for help from the Regional State Administrative Agency. The nationwide tele-

phone service number is +358 295 016 620.

● you may contact the police directly if you suspect an offence

● if the company is a member of APFI (Audiovisual Producers Finland), you may submit a notification using the [APFI notice form](#). You may submit the form anonymously, but you may also provide your contact information to facilitate the handling of the matter and for possible additional information.

If you observe inappropriate treatment, harassment or sexual harassment that does not affect you, intervene where possible. Notify your supervisor.

Special features of the film and television industry

● It may be difficult to report harassment when filming is in progress. Try to follow the above guidelines anyway and bring the matter up as soon as possible. Contact the production's harassment contact person, your supervisor or employer, and if necessary, contact your agency or casting office. Remember that you may also contact the employer after the filming or after your employment relationship has ended.

● The fear of being perceived as difficult and concerns about the future of your career may make it more difficult to report shortcomings. Communicating the matter to a reliable member of the work community may alleviate your concerns, and bringing the matter to the employer's attention allows them to intervene, resolve the situation and develop their operating methods.

● Working groups may also spend much of their leisure time together, for example in touring productions or parties celebrating the completion of projects. Everyone has the right to be treated appropriately also in their free time or in production-related events.

Guidelines for supervisors

If a supervisor receives a report of inappropriate treatment, harassment or sexual harassment, they have a statutory obligation to carry out an immediate and impartial investigation of the situation. The employer is ultimately responsible for investigating the situation and taking the necessary measures.

- Determine the course of events by talking to both parties.
- If any form of harassment has occurred, you are obliged to prohibit such behaviour. The supervisor's duty is to clearly establish what kind of behaviour is not acceptable in the work community.
- Take action in accordance with the company's policy.
- It is a good idea to record the conclusions and any issues instructions and orders.
- Monitor how the changes are realised and consider whether a follow-up discussion with the parties is necessary.
- If the situation is not resolved despite the measures taken, the employer has the right to take disciplinary action, such as issuing a warning to the harasser.
- As a last resort, the harasser's employment relationship may also be terminated if there are legal grounds for doing so.

Special remarks

- According to the Occupational Safety and Health Act, the employer must intervene in inappropriate treatment as soon as possible after becoming aware of the matter. If the situation is prolonged, the health of the harassed person may be endangered, the work community may be burdened and well-being at work may be affected.
- The workplace must have an operating model for handling cases in different situations, like during filming. Special operating models should be developed to solve cases under pressure.
- Inappropriate treatment may be unintentional, so it should be brought up as soon as possible with the person who has behaved inappropriately. This way, the person who has behaved inappropriately will have an opportunity to change their behaviour.

Guidelines for persons suspected or accused of harassment or other inappropriate treatment

If your colleague or employee reports that they feel that your behaviour is disruptive or your supervisor wants to discuss suspected harassment with you, adopt an appropriate mindset. Suspicions and different quiet signals, such as avoidant body language or repeated absences, should be taken seriously. Even if you feel that you are not guilty of harassment, do not play down the other party's experiences. Instead, immediately stop the behaviour described as inappropriate.

If you are suspected or accused of inappropriate treatment, harassment or sexual harassment:

- listen to what the party experiencing harassment or the investigating supervisor tells you
- try to see your behaviour from the perspective of the person experiencing harassment
- share your own view of the situation
- discuss how the situation could be resolved
- be prepared to apologise

- tell your supervisor that you are suspected or accused of sexual harassment
- also discuss it with a harassment contact person, occupational safety and health representative, employee representative or occupational health care if necessary.

Suspicions and accusations of harassment are always serious. It is important that the legal protection of all parties is taken into consideration when investigating the matter.

Employees shall avoid such harassment and other inappropriate treatment of other employees in the workplace that cause risk or hazard to their safety or health. (Chapter 4, Section 18 of the Occupational Safety and Health Act)

Read more

[Häirintä ja epäasiallinen kohtelu, Työturvallisuuskeskus \(in Finnish\)](#)

[Ombudsman for Equality](#)

[The Non-Discrimination Ombudsman](#)

[Occupational Safety and Health Administration](#)

[Työhyvinvointi ja työkyky, Työterveyslaitos \(in Finnish\)](#)

[The Mental Health Toolkit, Finnish Institute of Occupational Health](#)

Partners

Aalto-yliopisto, Elokuva- ja lavastustaiteen laitos
Animaatiokilta ry
Avate Audiovisuaalisen alan tekijät ry
Audiovisuaalisen kulttuurin edistämiskeskus AVEK
Business Finland
Dokumenttikilta ry
EFFC - Itä-Suomen elokuvakomissio
Elokuvan ja median ammattilaiset ELMA
Film in Finland
Film Lapland – Lapin elokuvakomissio
Film Tampere
Helsinki Casting & Blockbusters Gang
International Sámi Film Institute
Kansallinen audiovisuaalinen instituutti
Kirkon mediasäätiö
Kopiosto
Lavastus- ja pukusuunnittelijat LP
Metropolia AMK
Näyttelijäliitto - Skådespelarförbund ry
Palta
Pohjois-Suomen elokuvakomissio
Pohjoisen audiovisuaaliset ammattilaiset PAVA ry
SEFFC - Kaakon elokuvakomissio
Suomen elokuva- ja mediatyöntekijät SET ry
Suomen elokuvaajien yhdistys F.S.C.
Suomen elokuvasäätiö
Suomen Filmikamari ry
Suomen kuvausjärjestäjät ry

Suomen elokuvaleikkaajat - Finnish Cinema Editors F.C.E. ry.
Suomen elokuvaohjaajaliitto SELO ry
Suomen elokuvateatteriliitto - SEOL ry
Suomen elokuvatoimistojen liitto ry
Suomen Journalistiliitto – Finlands Journalistförbund ry
Suomen Näytelmäkirjailijat ja Käsikirjoittajat – Finlands Dramatiker och Manusförfattare ry Sunklo / Käsikirjoittajien Kilta
Taiteen edistämiskeskus
Teatteri- ja mediatyöntekijöiden liitto TEME ry
Tampereen ammattikorkeakoulu TAMK
Turun ammattikorkeakoulu
Yrkeshögskolan ARCADA
WFFC - Länsi-Suomen elokuva-komissio
Women in Film & Television WIFT Finland ry
Åland Film Commission

Guide coordinator

Audiovisual Producers Finland APFI ry