



**TECHNICAL ASSISTANCE FOR PROMOTING  
DECENT FUTURE OF WORK APPROACH WITH  
A FOCUS ON GENDER EQUALITY  
  
(TREESP1.3. FoW/P-01)**

**TÜRKIYE**

**CATEGORY 3: SCIENTIFIC AND TECHNICAL STUDIES**

**INTERVENTION 10: MOBBING COMPLAINTS WITH A PARTICULAR FOCUS ON GENDER**

**EXECUTIVE SUMMARY REPORT**

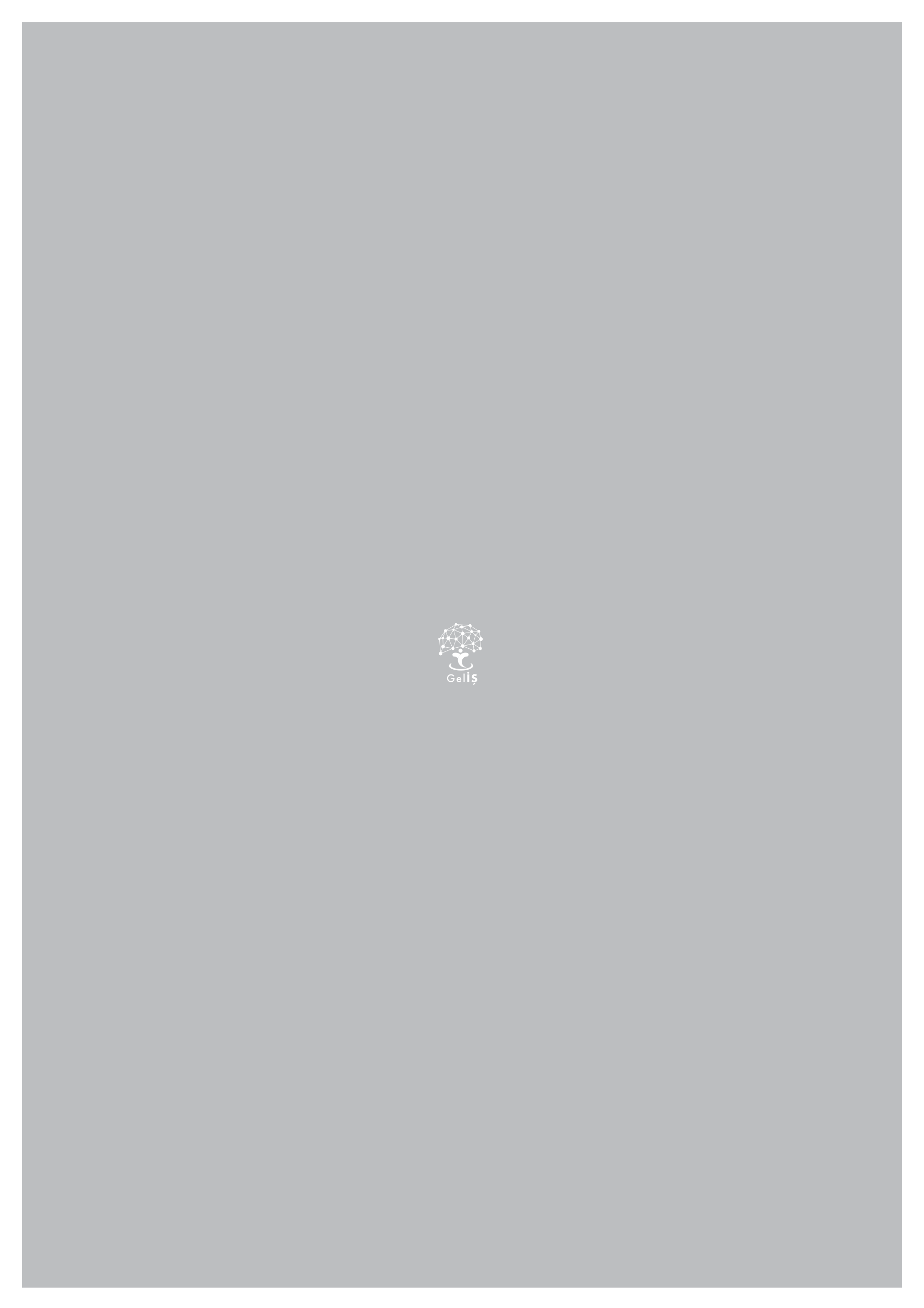
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LIST OF ABBREVIATIONS

|  |  |
| --- | --- |
| **Abbreviation** | **Meaning** |
| CEEP | European Centre of Employers and Enterprises |
| CEC | European Confederation of Managers |
| CHSCT | Hygiene, Safety and Working Conditions Committee |
| CIMER | Presidential Communication Centre |
| DWEA | Danish Working Environment Authority |
| ETUC | European Trade Union Confederation |
| EU | European Union |
| EF - PRIMA | European Framework for Psychosocial Risk Management |
| EUROCADRES | Trade Union voice of professionals and managers |
| FoW Project | Technical Assistance for Promoting Decent Future of Work Approach with a Focus on Gender Equality |
| HAK-IS | Confederation of Trades’ Unions |
| ILO | International Labour Office |
| INQA | New Quality of Work (Initiative Neue Qualität der Arbeit) |
| TAT | Technical Assistance Team |
| TIHEK | Human Rights and Equality Institution of Türkiye |
| TP | Technical Proposal |
| UEAPME | European Association of Craft, Small and Medium-sized Enterprises |
| WHO | World Health Organisation |

# EXECUTIVE SUMMARY

This Report was commissioned by the Turkish Ministry of Labour and Social Security (MoLSS)’s Department for Employment Policies, to examine the question of mobbing in a Turkish and an international context, and to develop recommendations to reduce the incidence levels in the Turkish workplace. The Report was produced by a Technical Assistance Team (TAT) working within the EU-funded project ‘Technical Assistance for Promoting Decent Future of Work Approach with a Focus on Gender Equality’.

Mobbing is the scourge of many a workplace, and has been since the dawn of organised labour. This Report contains a wealth of qualitative and quantitative information which examines mobbing in the context of international and Turkish legislation and policies, and the perception of the situation ‘on the ground’ through the eyes of stakeholder institutions and employers/employees.

The information has been derived from numerous sources (each element of which is attached to this Report in a series of standalone Annexes):

* Extensive desk research into international and Turkish approaches;
* A series of structured meetings with institutions directly involved in Mobbing issues;
* A Pre-Study Workshop at which 57 representatives of the public and third sectors formulated their views on how mobbing policies could be improved;
* A field study involving over 130 respondents using semi-structured questionnaires;
* A Post-Study Workshop at which 103 representatives of the public and third sectors provided feedback to the draft Recommendations.

This has been carefully analysed and processed to produce a series of 17 evidence-based recommendations which fall into 4 main categories:

* Legislation Changes;
* Improved Data Collection;
* Increased Awareness-Raising;
* Improved Mechanisms of Cooperation and Coordination among Responsible Institutions.

Two clear issues emerged from the work undertaken for this Report. The first is that the term ‘mobbing’ is not clearly understood (this is not just a Turkish phenomenon - legislation in other countries remains vague on the subject), and the second is that the data collection system in Türkiye lacks cohesion and consistency. The expression ‘if you can’t measure it you can’t manage it’ is particularly relevant here. Unless and until ‘mobbing’ is more clearly defined, and data collection becomes more consistent, the scourge of mobbing is likely to persist. The recommendations in this Report are intended to assist Turkish policy-makers to make some headway towards redressing the situation.

**FoW TAT**

**October 2022**

# 1. INTRODUCTION AND BACKGROUND OF THE STUDY

## 1.1 Aim

The primary aim of this Report, and the research it summarises was to equip Turkish policy-makers with information and evidence which could support changes to current policies and legislation to tackle the issue of mobbing in the Turkish workplace.

## 1.2 Scope

The scope of the research was contained to a range of Turkish institutions, including those currently responsible for information-gathering on mobbing complaints, together with 100 face-to-face interviews with Turkish employers and employees with regard to their understanding of the concept of mobbing, and actual experiences of workplace mobbing.

## 1.3 Commissioning the Work

The Report was commissioned by the Turkish Ministry of Labour and Social Security (MoLSS)’s Department for Employment Policies, to examine the question of mobbing in a Turkish and an international context, and to develop recommendations to reduce the incidence levels in the Turkish workplace. The Report was produced by a project team working within the EU-funded project ‘Technical Assistance for Promoting Decent Future of Work Approach with a Focus on Gender Equality’.

The project’s Technical Assistance Team contracted a research expert (Mr. Ahmet Gul) to conduct the field research and to contribute to the drafting of the recommendations and this Report. In all, 105 expert days were deployed to this exercise, which began in April 2022 and was concluded in August 2023.

## 1.4 Context and Focus

The project, Technical Assistance for Promoting Decent Future of Work Approach with a Focus on Gender Equality was given a Terms of Reference (ToR) which set the following task for the Technical Assistance Team:

*“In addition to the Operation Beneficiary, the Presidency of the Republic of Türkiye Directorate of Communications and Human Rights and Equality Institution of Türkiye are also two institutions responsible for mobbing issue.*

*In order to improve methods of data collection and statistics in mobbing cases, a desk study will be prepared by compiling official mobbing complaints and appeals received by abovementioned institutions for better understanding and implementation of the culture of decent work. Determination of relevant factors such as sector, age, sex, harassment, duration, physical and psychological consequences will be necessary to develop relevant policies.*

*Examination of three institutions’ records; interviews with officials of three responsible institutions; desk study and 100 indicative face-to-face interviews with employers and/or employees (in Ankara) will be conducted for the subject research.*

*A recommendation report which will include analysis of finding of the research will be drafted in English with executive Turkish summary and it will be used to draft relevant regulations and/or policies. The report should include diversification of province, gender, sector, age and title of people who are subjected to mobbing and so-called mobbing. It will be published on the official web site of the Operation Beneficiary.”*

# 2. RESEARCH METHODOLOGY AND APPROACH

## 2.1 Outline Methodology

The Project Technical Assistance Team, together with the research expert, carried out 5 levels of research into the subject of ‘mobbing complaints with a particular focus on gender:

* Extensive desk research into international and Turkish approaches;
* Qualitative research including a Preliminary Root Cause Analysis together with a series of structured meetings with institutions directly involved in Mobbing issues;
* A Pre-Study Stakeholder Workshop at which 57 representatives of the public and third sectors formulated their views on how Mobbing policies could be improved.
* Quantitative Research involving 100 face-to-face interviews with employers and employees in Ankara;
* A Post-Study Workshop at which 103 representatives of the public and third sectors provided feedback to the draft Recommendations;
* Data analysis

Each element is the summarised within its own sub-Section below, each is supported by an Annex containing a detailed report which provides all necessary information to support the 17 evidence-based recommendations which conclude this Report.

### 2.1.2 Desk Research (see Annex 1)

Desk research was conducted as a first step, in April-June 2021. It covered the following areas through a careful examination of official websites and research reports, and also presented a range of case studies from various EU member states to illustrate how different countries were attempting to tackle their own incidences of mobbing. The full Desk research Report may be seen at Annex 1.

### 2.1.3 Structure of Desk Research Report

The desk research report includes the following main section headings:

1. Current Legislative Framework and Policies in dealing with Mobbing Cases;

## European Countries’ Legislation on Mobbing and Work- Related Violence:

* European and International Organisations’ Approach to Reduce Mobbing/Work-Related Violence;
* European Framework for Psychosocial Risk Management (PRIMA-EF);
* ILO Strategies to Tackle Mobbing/Violence at Work;
* Raising Awareness on Psychological Harassment at Work – World Health Organisation (WHO)’

## iii) Some Policies and Initiatives in Europe;

## Turkish Legislation on Mobbing and Available Complaint Mechanisms.

### 2.1.4 Main Conclusions from Desk Research

### 2.1.4.1 European Framework for Psychosocial Risk Management (PRIMA-EF) (2000)

* Promotion of awareness and recognition of bullying/mobbing in EU countries and organisations is imperative;
* Bullying/mobbing at work needs to be seen as a work environment problem and prevention and reduction should concentrate on reducing the risks;
* Anti-bullying/mobbing policies and codes of conduct are needed which include clear and operable procedures to prevent and deal with bullying should be built;
* Management interventions are essential in the prevention of bullying/mobbing;
* When a bullying/mobbing case arises, it needs to be overseen and settled immediately with those involved.

### 2.1.4.2 ILO Strategies to Tackle Mobbing/Violence at Work

* After approbation of the Convention 190 on Violence and Harassment, ILO intentionally broadened the definition of where and how work happens (including related activities (such as communication, travel, and commute) and takes into account the impacts of domestic violence;
* The ILO Recommendation 206 establishes a uniform set of minimum standards that can help shape new policies and practices to recognize the dignity and value of all workers, avoiding any kind of violence.

### 2.1.4.3 World Health Organisation (WHO)

* The employer should adopt ways to inform and train managers and staff;
* Once harassment (mobbing) has started, the following methods proposed includes:
  + a confidant/e;
  + a mediator.
* Measures to help workers recover their health and dignity.
* Early diagnosis of health effectscan help reduce the consequences at all levels (the individual, the family, the social network);
* Consciousness-raising groupsthat bring together people who have suffered mobbing in different situations.

### 2.1.5 References Consulted for Desk Research

Please see the Bibliography in Section 5 of this Report.

## 2.2 Qualitative Research (see Annex 2)

The Technical Assistance Team conducted a range of meetings with relevant stakeholder organisations during the December 2021-February 2022 period. A short Meeting Note summarising these meetings may be found at Annex 2.

### 2.2.1 Stakeholder Meetings

Six in-depth interviews were conducted with the following institutions:

* CIMER
* MoLSS Press and Public Relations Consultancy;
* Ombudsman Institution;
* TİHEK- Human Rights and Equality Institution of Türkiye;
* MoLSS- Department of Guidance and Inspection;
* Ministry of Justice.

Additionally, Meetings were organised in December 2021 with 5 institutions:

* Ombudsman Institution,
* Presidency of Communication (CIMER);
* MoLSS Press and Public Relations Consultancy;
* MoLSS Press and Public Relations Consultancy;
* Human Rights and Equality Institution of Türkiye.

All interventions focused on:

* Definition of mobbing and legislation;
* Existing complaint mechanisms;
* Data collection and information sharing;
* Awareness and training activities in the fight against mobbing;
* Cooperation between public institutions and NGOs;
* Underlying causes and relationship to gender;
* Measures and recommendations to be taken in the fight against mobbing; were among the focus areas during stakeholder meetings.

### 2.2.1.2 Key Findings from Stakeholder Meetings

* Lack of an agreed and common understanding on the definition of mobbing;
* no coherent data collection mechanisms (each responsible institution collects their own data but there is no common database and data sharing among the institutions, preventing the development of evidence-based policies for fighting against mobbing);
* Following on from this, the possibility of an independent Mobbing Council was mooted.   
  In this sense, although applications are made through various institutions and organisations and different mechanisms (CIMER, ALO 170, etc.), applications are made to the Human Rights and Equality Institution and the Ombudsman Institution within the scope of rights violations and discrimination in general, even if there is no mobbing in particular, and they are evaluated in these Boards. Therefore, the creation of a separate council, such as an Independent Mobbing Council, may mean entering the jurisdiction of existing institutions, since TIHEK is an institution established for this purpose. In addition, making applications through different institutions and channels could lead to confusion. Therefore, an arrangement can be made within the scope of this institution, such as a Mobbing Unit within this institution, and an arrangement can be made such that applications are made to this single institution;
* There is no data desegregation by gender, age, sector, and similar parameters;based on the application made through different mechanisms (such as ALO 170) and surveys, the data revealed by gender, sector, etc. as differentiated. The problem is not the absence or segregation of data, but the lack of a secure and unbundled TR-wide database;
* There is a lack of awareness-raising and training activities (to create awareness among the public and among the employers and institutions on mobbing behaviour and the methods for its prevention); after the Prime Ministry Circular No. 2011/2, many institutions and organizations, notably the Anti-Psychological Harassment Board established within the MoLSS, carried out awareness-raising and training activities on this issue, and the level of awareness on mobbing was increased significantly across TR. Therefore, an expression such as awareness raising and training activities should be increased.

### 2.2.2 Root Cause Analysis (included in Annex 1 (Desk Research))

### 2.2.2.1 Overview

Root Cause Analysis (RCA) is a popular and often-used technique that helps people answer the question of why a problem has occurred. It seeks to identify the origin of a problem using a 3-Step approach, to find the primary cause of the problem. The 3 Steps are:

1. Determine what happened.
2. Determine why it happened.
3. Determine what to do to reduce the likelihood that it will happen again.

RCA assumes that systems and events are interrelated. An action in one area triggers an action in another, and another, and so on. By tracing back these actions, you can discover where the problem started and how it grew into the symptom you're now facing.

Generally, there are three basic types of causes:

* Physical or Structural causes - Tangible, material items failed in some way (for example, a car's brakes stopped working).
* Human causes - People did something wrong, or did not do something that was needed. Human causes typically lead to physical causes (for example, no one filled the brake fluid, which led to the brakes failing).
* Organisational causes - A system, process, or policy that people use to make decisions or do their work is faulty (for example, no one person was responsible for vehicle maintenance, and everyone assumed someone else had filled the brake fluid). RCA looks at all three types of causes. It involves investigating the patterns of negative effects, finding hidden flaws in the system, and discovering specific actions that contributed to the problem. This often means that RCA reveals more than one root cause.

### 2.2.2.2 An Example from the Preliminary RCA

Thefollowing is an example taken from a more extensive preliminary RCA which was included in the Desk Research Report (Annex 1):

|  |  |  |  |
| --- | --- | --- | --- |
| **What Happened?** | **Why did it happen?** | | |
|  | **Physical/Structural** | **Human/Societal** | **Organisational** |
| Verbal abuse – being subjected to insults - men/women shouting to men/women. |  | * Acceptance, in some communities, of an aggressive approach to life. | * Lack of workplace policies regarding appropriate standards of behaviour. |

### 2.2.2.3 Usage

The RCA approach was adopted during most of the meetings, interviews and discussions.

## 2.3 Pre-Study Workshop (see Annex 3)

### 2.3.1 Workshop Structure

A Pre-Study Workshop on Mobbing Complaints was held on 10 March 2022 online: 57 stakeholders participated, drawn from the public and third sectors. An Evaluation Report may be seen at Annex 3.

The 1-day Workshop was, broadly, divided into 2 halves: the morning session comprised a series presentations from MoLSS, TAT and TAT’s experts aimed at establishing a Turkish and international context for subsequent stakeholder discussions on the issue of mobbing; the afternoon session was focused on stakeholder discussions, held in 3 ‘break-out rooms’, with each room discussing a specific topic in line with the Agenda - feedback from each room was delivered immediately prior to the final wrap-up session.

In the afternoon session, participants were divided into three groups to discuss three different topics related to mobbing policies in Türkiye:

* Group 1: Inter-Institutional cooperation and data sharing
* Group 2: Perception of Mobbing
* Group 3: Indicators

Each group was moderated by an expert, who guided the participants though focus questions and took notes during discussions.

### 2.3.2 Summary of Main Findings

### 2.3.2.1 Group 1: Inter-Institutional Cooperation and Data Sharing

1. Mobbing is a very important phenomenon which has many economic, social, and psychological consequences at individual and community level. Thus, it might be included in the Criminal Law with heavy sanctions.
2. There is a need to conduct an impact analysis for Prime Ministry Circular No. 2011/2. The Circular foresees important tasks to be carried out by the employers and the impact analysis should indicate if the employers have undertaken these tasks so far.
3. There is a need to prepare specific legislation on mobbing.  **P**rotective, preventive and sanction-containing provisions can be added to existing laws might be more appropriate.
4. Data collection and sharing is a very important tool for effective fight against mobbing. As such, sectoral measures can be taken by careful analysis of sectoral data on mobbing. A mobbing mapping study can be developed to present mobbing data per sector, business, province, region, gender, age, etc. This would feed into policies and programmes for prevention of mobbing.
5. ILO Convention No. 190 is an important tool for prevention of mobbing so it is suggested to be signed.
6. Women may refrain for reporting mobbing cases due to many issues including gender inequalities. Thus, their access to complaint mechanisms might be increased and they might be supported with special tools and programs.
7. Awareness raising and information programs might be carried out for increasing public awareness on complain mechanisms, sanctions, and methods for fighting against mobbing.
8. Training seminars might be implemented at workplaces at regular intervals (every three or five years).
9. There are many publications and reports by NGOs which are available at their websites. These reports might be shared among public institutions and also could be disseminated among the public.

### 3.2.2.2 Group 2: Perception of Mobbing

1. While defining the Psychological Harassment (Mobbing), it might be stated that it can be directed not only to "one person" but "to more than one person". “Intention”, “systematic application” and “frequency” might be among the elements.The definition made by the Psychological Anti-Harassment Board in 2014 includes these elements. Performed by one or more persons in the workplaces for another person or persons, continuing systematically for a certain period of time, aiming to intimidate, pacify or remove from work; harming the personality values, professional status, social relationships or health of the victim or victims; malicious, intentional, negative attitudes and behaviours.
2. People's awareness might be increased with correct definitions and elements of what mobbing is. As a matter of fact, mobbing is an abstract phenomenon and there is a need to distinguish whether the issue that people complain about is caused by the character of the person, conflict or really mobbing. In most of the complaints made to ALO ​​170, it has been determined that the complainants define mobbing themselves and they complain about the issues that are not actually mobbing.
3. Participants suggested that mobbing complaints are reported by men more than women. However, studies have shown that women are subjected to psychological harassment due to gender inequality. The reason why women do not report their complaints may be due to cultural, economic and social reasons. Confidentiality, non-disclosure and privacy are important in the complaint process and data collection.
4. In many cases, senior managers exhibit mobbing behaviour against their juniors. But there are also cases for the reverse situation in which a junior employee tries to undermine the authority of a senior manager. This might be also considered under mobbing perception.
5. In accordance with the hierarchy of norms, there was a need that a separate law and main rules might be determined, and then administrative regulations might be made on a sectoral or professional basis for practices.
6. It was emphasised that workplaces might make transparent arrangements for their workers and create a commission, and that union representatives might also take part in this commission.
7. There are various effects of mobbing at individual, community and economic levels. At an individual level, the health and wellbeing of the person who is exposed to mobbing can be affected. At community level, the family is negatively affected and there can be social unrest. The productivity is reduced and there can be economic consequences.
8. Data analysis needed to be standardised, data analysis might be carried out on the basis of professions rather than sectors, minimising the groups in data analysis gives more accurate results. Public and private sector, and particularly education and health sectors, where mobbing cases are most common, might be examined.
9. Mobbing could also occur in the form of giving more workload to one or some workers. In addition, it was stated that mobbing is more common in sectors with performance pressure and productivity concerns (such as banking).
10. Gender roles also created cases of mobbing. A woman could be absent from the workplace due to care work and domestic responsibilities, which raised psychological pressure from the senior managers and colleagues and resulted in career pitfalls for women.
11. Labour inspectors impose sanctions on workplaces within the scope of Article 5 of the Labour Law, but this sanction is not a deterrent (397 TL per person for the year 2022), there is a need to have more deterrent sanctions.
12. During the COVID 19 pandemic, it was stated that mobbing was applied to the workers with the Provisional Article 10 of the Labour Law, indefinite unpaid leave was applied, and this situation was abused by the employers, some workers were deliberately left unemployed, and this had serious psychological and economic damages.

### 3.2.2.3 Group 3: Indicators

1. It was suggested that the registration form to be prepared might be differentiated according to demographic characteristics, sector and business branches.
2. There appeared to be a need that measurement can be made with questions that will exemplify their experiences at work. (Have you been made to feel inadequate at work?
3. Turkish norms might be used to develop a scale for measuring mobbing in Türkiye.
4. An umbrella organisation could be needed to coordinate the works. The Psychological Anti-Harassment Board carries out activities to contribute to the determination of policies across the country for the prevention of psychological harassment in the workplace, to coordinate education and information activities, to conduct research and examinations on needed issues, to prepare reports, guides and information documents, and to raise public awareness. Therefore, it has been established after the Prime Ministry Circular as the institution that will ensure the coordination of mobbing studies. The effectiveness of the Anti-Psychological Harassment Board can be increased in order to determine nationwide policies to prevent mobbing and to coordinate the studies to be carried out in this regard.
5. It was important to receive individual applications through a standard form via a common registration database. Then, these applications can be grouped and thus mobbing cases can be separated.
6. The Bar Associations might be included among the stakeholders.
7. Similar to the above suggestion, the good practices can be rewarded.
8. There should be more protective, preventive and sanction-containing provisions could be added to existing laws.
9. Impact assessment was a must for detecting the impact of legislation and policies in preventing mobbing cases.
10. A 'Mobbing Mapping' study could be developed to indicate mobbing cases on a map by province, district, gender, age, sector, business branch, etc.
11. A mobbing measurement tool could be developed in accordance with Turkish norms by making its validity and reliability.

## 2.4 Field Research (see Annex 4)

### 2.4.1 Methodology

The field study was based on a semi-structured questionnaire containing 45 questions (for employees and for employers) which had been prepared and piloted in Ankara in February 2022 (the questionnaires are included as Annexes to the Field Study Report which may be seen at Annex 4). The field study itself took place in Ankara in March 2022 in Ankara. 109 employees and 36 employers from sectors such as manufacturing and services were interviewed, face-to-face, using the semi-structured questionnaire. Before distributing the questionnaires, respondents were given a brief explanation about the confidentiality and the procedure of the study, and were guaranteed anonymity. For each participant the procedure took approximately 20-25 minutes on average.

### 2.4.2 Focus of Questioning

Questions put to employers and employees were similar and conformed to the following main headings:

* Demographic Information;
* Definition and Perception of Mobbing in the Workplace;
* Perceived Task Distribution in the Workplace by Gender;
* Level of mobbing experienced at the work place by gender;
* Perceived Causes of Mobbing in the Workplace;
* Response to Mobbing Behaviour;
* Exposure to Various Mobbing Behaviours among Employees/Employers.

### 2.4.3 Data Analysis

The data derived from the responses was subjected to detailed analysis, using the SPSS package program. Dues to the relatively small sampling size, data analysis was limited to descriptive analysis (i.e. frequency distribution and summary statistics (mean, standard deviation or proportion). In order to assess the impact of socio-demographic and project variables, stratified analyses were performed (gender, age, education level). High-rated responses were then discussed in the text. The full analysis may be seen at Annex 4.

## 2.5 Post-Study Workshop (see Annex 5)

### 2.5.1 Workshop Structure

A Post-Study Workshop on Mobbing Complaints was held on 7 June 2022 in hybrid format: a total of 103 participants were involved (78 online and 25 in-person) drawn from the public and third sectors. An Evaluation Report may be seen at Annex 5.

The 1-day workshop was focused on outlining the field study methodology and presenting the main (draft) recommendations which the Technical Assistance Team had developed, based on all the preceding elements in this Report. Participants were invited to comment, amend, or reject any of the recommendations, and their views would be taken into account before formulating the final recommendations (which may be seen in Section 3 of this Report

### 2.5.2 Summary of Key Findings

In fact, the recommendations listed in Section 3 have all taken account of the views expressed during the Post-Study Workshop. Suffice to say that, while there were animated discussions during the workshop, very little was suggested which required any major changes to the original draft recommendations.

# 3. RECOMMENDATIONS

These recommendations are based on the qualitative and quantitative information derived from the Desk Research, stakeholder meetings, the Pre/Post-Study Workshops, and the Field Study’s face-to-face interviews.

## 3.1 Legislation

The definition of Mobbing at the workplace remains unclear and there is a confusing lack of agreement and common understanding in handling complaints of workplace psychological harassment. The proposed recommendation will be in line with ILO Convention 190.

These recommendations follow the Desktop Research, that stated there is not a specific legislation on mobbing in Türkiye. However, revised provisions in the existed legislation provide a basis for litigation of mobbing cases:

* In the Constitution of the Republic of Turkey, Article 12, which determines the nature of fundamental rights and freedoms and emphasizes that “Everyone has fundamental rights and freedoms that are personal, inviolable, inalienable and indispensable”. Immunity of a person is guaranteed under Article 17, which regulates his material and spiritual existence and regulates that “everyone has the right to live, to protect and develop his/her material and spiritual existence”
* Article 5 of the Labour Law No. 4857 and MD. 24/II AND 25/II obliges employers to apply the principle of equality among their workers in the employment relationship;
* Mobbing at workplace is also regulated under the Law No: 6098 on Debts where Article 417 aims at protecting the worker against mobbing at the work place;
* The following laws also include provisions regarding mobbing: Turkish Civil Law No. 4721, Turkish Criminal Law No. 5237, Civil Servants Law No. 657 And Occupational Health and Safety Law No. 6331
* The *Trade Unions and Collective Bargaining Law No. 6356* contains comparable provisions;
* The *National Employment Strategy 2017-2019* covers the topic in the main policy axis of "Increasing Employment of Groups Requiring Special Policy".

The Desk Research also mentioned that in Article 26 of the revised European Social Charter of 1996, approved in Türkiye by the Law No. 5547 of 27 September 2006, provides for the protection of employees against sexual harassment and psychological harassment in the workplace.

Important mechanisms available in Türkiye for submitting complaints when a person is exposed to mobbing are: the Presidential Communication Centre (CIMER); the ALO 170; the Ombudsman Institution, where real and legal persons who claim that they have been subjected to psychological harassment by the actions and acts of the administration can file a complaint without paying any fee; and finally Individuals can apply to the Human Rights and Equality Institution of Türkiye without paying any fee, if they allege that they are exposed to intimidation and discrimination in their workplaces.

In conclusion, there is not a specific legislation on mobbing in Türkiye. However, revised provisions in the aforementioned legislation provides an important basis for litigation of mobbing cases.

In the stakeholder meetings held in December 2021 and April 2022 the stakeholders interviewed stated that there is a lack of an agreed and common understanding of the definition of mobbing. During the Pre-Study Workshop, particularly in Group 2 (which considered the “Perception of Mobbing’, key issues which emerged included: ’While defining the Psychological Harassment (Mobbing), it might be stated that it can be directed not only to "one person" but ‘to more than one person’; ’Intention’, ‘systematic application’ and ‘frequency’ might be among the elements” and also that “In accordance with the hierarchy of norms, there is a need that a separate law and main rules might be determined, and then administrative regulations might be made on a sectoral or professional basis for practices”.

In the Field Study, participants made important contributions to identifying the main characteristics of mobbing - the perceived task distribution in the workplace by gender and the level of mobbing experienced at the work place by gender - which can help to formulate a more complete and better definition.

The **main recommendations** with regard to legislation are:

1. To clarify the definition of mobbing in the workplace, considering:

• types of acts constituting mobbing in the workplace (including public and private areas and “the areas where the employee is paid, go out to rest or have dinner or washbasins, showers and changing clothes”);

• work-related trip, travel, education, event or social activity;

• situations arising through business communications, including through information and communication technologies.

1. Legally prohibit mobbing, including gender-based violence in the workplace
2. Developing inter-agency cooperation and coordination with a view to bringing measures to effectively protect victims of mobbing.
3. Recommend research on possible preventive initiatives to achieve a harassment-free work environment.
4. Require employers to introduce appropriate control steps to prevent harassment within their company, taking into account:

• Associated psychological risks in occupational health and safety management;

• Information and training needs and provision

The comments of the stakeholders during the Post-Study Workshop (June 2022)can be summarised as follows:

* There is a declaration for prevention of mobbing issued by the Association for Fighting against Mobbing. The chair of the association called for an action for the signing of this declaration by all enterprises and also institutions in the public and private sector.
* TİHEK has carried out a field study with 137.000 persons on mobbing complaints. The results of the study will be published in July 2022. The report is very important in terms of presenting a statistically representative picture of mobbing in Türkiye.
* Looking at the issue from a gender equality lens, it was emphasised that women and men see the issue of mobbing from different aspects. The definitions and perception of mobbing as well as fighting mechanisms might be quite different among men and women. Thus, the field study under the project will reveal very important input in terms of developing gender-sensitive support policies and prevention mechanisms for mobbing. Mobbing victims need empowering support and also in some cases women may lack financial resources to open a file against mobbing. Access to justice among women is an important issue when dealing with mobbing.
* Stakeholders pointed out that mobbing definition can be reviewed in terms of including different types of violence and mobbing. It can be psychological or sexual.
* The issue on the lack of proper and specific legislation was repeated. ILO Convention No 190 was also emphasised due to its valuable importance for prevention of mobbing especially for ensuring gender equality while preventing mobbing.
* To clarify the definition, more studies are needed which should include: migrant workers and their exposure to mobbing which is intensive due to the informal working situations among migrant workers; NGO´s, Universities and academic institutions should be encouraged to carry out field studies and contribute to the existing literature on mobbing in Türkiye.
* Prevention of mobbing is vital and more cost-effective. Thus, there must be intensive and periodic training and awareness raising activities within the organisations and workplaces. Specific training on mobbing should be included in the official curricula in education.
* Apart from the lack of specific legislation on mobbing, there are also issues regarding the implementation of the existing law. The judges should be trained on gender-sensitive handling of mobbing cases. In addition, burden of proof causes forfeiture and women are victimised in law suits. Criminal sanctions are needed for effective fight against mobbing since the existing monetary sanctions are not sufficient.

## 3.2 Data Collection

In the Desk Research Report (Annex 1), it is shown that over the past 25 years the workplace mobbing literature has grown extensively. The current review presents an opportunity to understand the defining features, measurement methods and prevalence studies of victims and witnesses of mobbing.

During the December 2021 and April 2022 stakeholder meetings, it was pointed out that there is a need to develop effective policies to have disaggregated and representative data on mobbing at national and sectoral levels. The responsible institutions might work together to create a common database for recording mobbing complaints and the data should be shared among relevant institutions in accordance with the protection of personal data law. A mapping study could guide the policies and programmes with evidence from sectors, regions, and businesses. They also indicated that for effective measurement of mobbing, clear and appropriate indicators might be chosen and monitored at regular intervals. A standard and validated scale could be and applied at national level at regular intervals.

In the Pre-Study Workshop (March 2022), the stakeholders interviewed stated that there is a lack of an agreed and common understanding on the definition of mobbing;

* there are no coherent data collection mechanisms (each responsible institution collects their own data but there is no common database and data sharing among the institutions, preventing the development of evidence-based policies for fighting against mobbing);
* The awareness of the phenomenon might influence the prevalence rates on using the self-labelling method. The variations of prevalence rates can be reduced by developing a uniform definition, measurement methods and operational criteria for examining the phenomenon. The researchers have to further devise effective intervention mechanisms to curb and control the phenomenon in workplaces across the globe.

The **main recommendations** with regard to data collection are:

1. Develop an accepted method for recording cases of workplace mobbing to provide comparability methods at the national, regional and sectoral levels.
2. Conducting further quantitative and qualitative research to gain a deeper understanding of the experiences and motivations of victims, witnesses and perpetrators.
3. To provide gender-disaggregated data in order to establish gender-sensitive policies.

The comments of the stakeholders of the Post-Study Workshop can be summarised as follows:

* Complaints must include the sex of the accused (it must be included in the forms).
* Public institutions and organisations can cooperate to create a shared database at the national level. The creation of this database will greatly contribute to the work carried out by the Anti-Mobbing Board, which was established with the Circular numbered 2021/2, to prevent mobbing.
* The Circular No. 2011/2 should be updated in the light of current developments and its structure and effectiveness should be strengthened.

## 3.3 Awareness-Raising

During the December 2021 and April 2022 meetings, together with the suggestions during the Pre-Study Workshop and also the responses of some employees and employers during the Field Study, awareness raising among the employees and employers is an important tool for the prevention of mobbing and the fight against it. Regular training programmes could be coordinated in both the public and private sectors, and an awareness-raising campaign could be initiated through social media or other communication tools.

Particularly in the April 2022 meetings, all stakeholders agreed on the need for awareness-raising in the form of internal training or informative seminars to be given to employees and managers for clarifying the elements of mobbing and the behaviours which may result in mobbing at the workplace. They indicated that the current level of awareness on mobbing is not at the desired level and all companies/sector should consider organising such seminars and meetings for their employees at least twice a year.

From the Field Study, a common understanding was observed among the respondents regarding the negative effects of mobbing.

The April 2022 meetings confirmed that decreased performance and mental wellbeing can be seen among employees exposed to mobbing. One participant from a civil society organisation highlighted the importance of categorising mobbing as a type of occupational disease.

In conclusion, from the totality of the research, the **main recommendations** suggested are:

1. Carry out awareness-raising activities on employers' obligations in a way that will provide a safe and risk-free working environment, including the risk of psychological harassment.
2. Develop a consultation mechanism with employees to identify or evaluate mobbing in the workplace by establishing coordination with workers' and employers' unions, making decisions about measures to resolve these situations, providing information and training, and suggesting changes to avoid these situations.
3. Provide and maintain reasonably viable, safe, and harassment-free work systems (setting values and standards, effective leadership).
4. Develop, in consultation with employees, a workplace harassment policy that is easily accessible and communicated to all employees, which encourages transparent reporting of workplace mobbing issues.
5. Develop more information, instruction, training and control mechanisms that will prevent the risk of mobbing in the workplace.
6. Establish mechanisms and determining methods for employees to promptly deal with and take action on mobbing complaints from employers.
7. Develop clear protection mechanisms before, during and after a workplace mobbing report or complaint is made.

## 3.4 Cooperation and Coordination Mechanisms Between Institutions

From the December 2021 and April 2022 stakeholder meetings, and the main recommendations of the Pre-Study Workshop, efforts to combat mobbing should be carried out effectively, in cooperation with all stakeholders of working life, under the coordination of the Psychological Harassment Board established within the General Directorate of Labour.

The comments of stakeholders can be summarised as follows:

* Labour Unions have also a vital role in the fight against mobbing. Participants from Confederations from stated that they had started to include mobbing provisions in their collective agreements. This promising practice might be disseminated throughout all sectors.
* Last but not least, cooperation and coordination among stakeholders are the two fundamental tools for effective prevention and fight against mobbing. Thus, the Post-Study Workshop (7 June) was considered to be a very effective and successful platform for ensuring that all stakeholders became aware of what different organisations, and structures were doing, and hence learned from each other. A similar platform for data-sharing might be developed by data-sharing protocols, in the view of the participating stakeholders.

The **main** r**ecommendations** on this are:

1. Promote acceptable workplace standards regarding mobbing in the workplace through social dialogue, involving public institutions and organisations, social partners, NGOs and universities.
2. Generate and sustain permanent spaces for collaboration between institutions on mobbing.

# CONCLUSIONS

From all of the information in this Report and its Annexes, the following conclusions may be drawn:

* On the findings of the qualitative analysis, there is coincidence between the main causes (Physical/Structural, Human/Societal and Organisational) of mobbing, the lack of an agreed and common understanding on the definition of mobbing, and the current data collection mechanisms. There was also a common perception among the participants that education and health sectors are the two main sector in which there is a high prevalence of mobbing.
* These issues were explored during the field study. Employees do interpret oppressive and intimidating behaviour in the workplace as a form of mobbing but are not familiar with the idea of `systematic and repetitive` mobbing behaviours as defined in relevant legislation. Any hostile, intimidating oppressive act, both physical and verbal, which affects the mental wellbeing of the employee are recognised, however, as mobbing behaviour. The Study flagged up that 13.4% of female respondents had been exposed to at least one of the listed mobbing behaviours in the last 6 months for at least once a week, e the ratio of male respondents was 3.6%. Also, looking at the age distribution among women and men, it is emerged that single women and women between aged 30-39 constitute the majority among respondents who stated that they have been exposed to mobbing at the workplace (64.3% and 68% respectively). A statistically meaningful difference was not found between male and female respondents by marital status and age groups.
* From the analysis of the findings from employer face-to-face interviews, there is a coincidence with employees in the conception of mobbing, with employers recognising women as socially disadvantaged with the majority of the respondents (72.2%) believing that women are disadvantaged in work life due to cultural and patriarchal prejudices, care responsibilities biased towards women, and the lack of work-life balance. Only 27.8% of the respondents stated that they do not think women as a disadvantaged group in the work life.

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Attached to this Report:

Annex 1: Desk Research Report;

Annex 2: Meeting Note of Stakeholder Meetings;

Annex 3: Evaluation Report on Pre-Study Workshop;

Annex 4: Field Study Report;

Annex 5: Evaluation Report on Post-Study Workshop.

**FoW TAT**

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