



Guideline aimed at the Private Sector to address Gender based Violence

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The views and opinions expressed in this publication are those of the author(s) and do not necessarily reflect the official policy or position of the Commission on Gender-Based Violence and Domestic Violence."



Introduction

These guidelines are designed for the private sector as part of The Malta Chamber's initiative, "Strengthening Employer Responses to Digital GBV." The initiative is funded by the Commission on Gender-Based Violence and Domestic Violence through the 'Together We Empower – A Future without Violence' programme. This project addresses the growing threat of digital gender-based violence, including deepfake abuse, in Malta's workforce. The Malta Chamber Foundation leads the initiative, fostering collaboration among employers, government, and civil society to deliver a comprehensive, whole-of-society response. Through structured dialogue, practical guidance, and targeted awareness campaigns, the initiative equips businesses to support employees affected by online violence, strengthen workplace safety, and advance national efforts to combat digital abuse. By proactively addressing gender-based violence, businesses can improve productivity, minimise legal and reputational risks, and enhance their capacity to attract and retain talented staff.

Gender-based violence, including domestic violence, sexual assault, stalking, and other forms of abuse, has a profound and lasting impact on victims. Regardless of where it occurs, such violence significantly affects the workplace. Increased awareness has highlighted the need for proactive interventions to ensure employee safety and mitigate the economic impact of gender-based violence. This issue can extend into the workplace, resulting in threats or incidents with grave consequences. When experienced outside work, gender-based violence can lead to decreased productivity through increased absenteeism, staff turnover, and resignations. Perpetrators may interfere with victims' professional responsibilities through stalking, persistent communication, or by disrupting essential services such as transport and childcare. This violence contributes to higher health-related costs due to increased medical needs and absences, often compounded by shame. Additionally, gender-based violence exacerbates global inequalities and entrenches harmful stereotypes about women's participation in the workforce.

Types of violence against women

Violence against women and girls is a widespread human rights violation occurring daily worldwide. It has severe physical, economic, and psychological effects that hinder full participation in society. Its impact is vast, affecting individuals, families, and society. Gender-based violence harms women because of their gender, including physical, mental, or sexual harm, threats, coercion, and restrictions on liberty. Its roots lie in discrimination and unequal power between men and women.



Intimate-partner violence

This describes behaviour by a partner or ex-partner that causes physical, sexual, psychological, or economic harm. It encompasses physical assault, sexual coercion, emotional manipulation, and financial control. As a common form of domestic violence, it reflects ongoing patterns of control and abuse within private relationships.

Sexual violence

Sexual violence encompasses any unwanted sexual acts committed without consent, including harassment, assault, rape, and sexual exploitation. It can involve verbal, physical, or digital behaviours. Examples include rape, corrective rape, exploitation linked to trafficking, and abuse in armed conflicts. This type of violence often exploits vulnerability, power imbalances, or coercion.

Femicide

Femicide refers to the deliberate killing of women or girls due to their gender. It represents the most severe form of gender-based violence and often happens after previous abuse. This can take place in domestic or public environments, such as “honour killings,” which are based on discriminatory views about women’s roles and conduct.

Human trafficking

Human trafficking profits from exploiting individuals using coercion, manipulation, or force. Women and girls are especially vulnerable to sexual exploitation. Victims often endure abuse, loss of freedom, and are controlled via threats or confiscation of their documents.

Harmful practices

These are practices rooted in culture that infringe on women’s rights, such as female genital mutilation (FGM) and child or forced marriage. FGM results in serious physical and psychological damage, while child marriage reduces educational opportunities and raises health risks, thereby reinforcing gender inequality.

Sexual blackmail (Abuse of authority)

This practice refers to conduct where an employee’s rejection or acceptance of unwanted sexual behaviour is used as grounds for employment-related decisions, such as hiring, ongoing employment, training, salary, or promotions. It involves abuse of authority because only someone with direct or indirect supervisory or managerial power can threaten or make decisions that impact the harassed employee.

Online or technology-facilitated violence

This covers harm facilitated by digital tools, including cyberbullying, doxing, and the non-consensual sharing of images. It not only intensifies existing abuse but also creates new dangers, such as AI-driven image manipulation. Women in public roles face especially high risks.

Examples of online GBV include:

- violence or abuse

- threats of violence
- discrimination
- online harassment
- sharing sexual and private images without consent
- trolling
- doxing - revealing personal or identifying documents or details online without consent

Stalking

Examples of stalking behaviour include persistent efforts to contact an employee via email, phone, social media, or through a third party; following, observing, or photographing a person; and repeatedly sending overly personal, malicious, or threatening messages or items.



Identifying GBV in the workplace

Disclosing gender-based violence can be deeply traumatic for victims, and many hesitate to report it because of fears of repercussions, a desire to avoid reliving their trauma, or doubts that reporting will lead to action. These concerns require sensitivity and support.

Managers should remain alert for any signs that an employee may be affected. Because experiences of gender-based violence are deeply personal, the signs will vary from person to person.

Signs may include:

- Performance: Unexplained decline in work quality; refusal to engage in professional development or training opportunities; reduced involvement in team meetings; lack of engagement in online chats or frequent offline status; and visible signs of discomfort or tension during meetings.
- Attendance: Consistently arriving late or leaving early; coming in early or staying late without a clear reason; and more frequent absences.
- Behaviour: Avoids social spaces or events and withdraws from support channels such as team chats or catch-ups. Experiences a loss of confidence and feels uncomfortable around specific colleagues. Shows increased anxiety, distraction, and difficulty concentrating. Exhibits signs of stress and becomes easily overwhelmed or startled.
- Physical: Changes in appearance; feelings of fatigue or exhaustion; heightened physical tension; panic attacks; sleep or eating disorders, or both; substance misuse or dependence, or both; self-harm or suicide attempts, or both.

These signs are not evidence that someone is experiencing GBV and should never be used to make assumptions or confront an employee. The manager's role is to notice changes and offer support, not diagnose abuse.

Recommendations that The Malta Chamber encourage local enterprises to consider and implement to address Gender Based Violence

Drawing on research and established best practices, The Malta Chamber has outlined the following recommendations for local enterprises to consider in their organisational policies and procedures. These recommendations serve as guidance for strengthening internal practices, rather than prescriptive text. As legislation evolves and new challenges emerge—particularly in the realm of digital GBV—employers should maintain flexibility in their policies to ensure effective support for employees affected by gender-based violence.

To help employers move from guidance to action, it is recommended to start with a simple checklist:

- Review existing workplace policies for coverage of gender-based violence and digital GBV.
- Where possible, appoint a designated GBV lead or internal contact person responsible for implementation and queries.
- Communicate to all staff the commitment to preventing gender-based violence and the updated reporting procedures.
- Identify and update reporting mechanisms, ensuring they are accessible and confidential.
- Ensure managers and supervisors are aware of the risks and realities associated with GBV and the expected response.

For example, a company could begin by forming a small internal working group to review current policies, identify gaps related to digital harassment, and draft an initial action plan for management approval. Taking these first steps can lay the foundation for a more comprehensive and effective response.

Gender based violence at the place of work

- Ensure that the code of conduct is regularly reviewed and updated to address gender-based violence, technology misuse, and unacceptable behaviour in the workplace. Include comprehensive definitions and examples of prohibited conduct, and provide clear guidance on interpreting different behaviours—

especially considering power dynamics between junior and senior staff. All codes of conduct and related procedures must align with current legal requirements and reflect best practice standards.

- A detailed reporting policy that sets out how all staff within the organisation can report incidents of sexual harassment, whether as victims or witnesses. This includes clear, visible and robust reporting channels. These channels must address barriers to reporting, including concerns that reports may not be taken seriously, and clarify how anonymous reports will be investigated. Creating safe, accessible communication channels, such as anonymous reporting tools or a confidential reporting system, may help employees raise concerns without fear of retaliation. Importantly, the policy must ensure that potential victims or witnesses of harassment are not deterred from reporting incidents. Anonymity may limit the organisation's ability to investigate and verify allegations.
- Facilitate temporary workplace adjustments when possible to protect the victim, especially during the initial stage of the report.
- The investigation policy sets out clear, easily understood information for all staff on the investigatory and decision-making process, including associated time frames. The policy should ensure that any investigations are independent and fair. It must clarify the range of measures that may result from the investigation, as well as information about appeal processes and how to access them. Internal investigation mechanisms must not prevent the organisation from reporting any incident to the competent authorities, nor delay such reporting, especially when immediate psychological and physical harm is at risk. Trained staff should manage any internal investigation.
- The Human Resources department can implement victim support measures, and when in-house support is unavailable, provide victims or witnesses with information about available support through external organisations, such as non-governmental organisations. This should not be delayed, and HR departments must have the relevant information to guide victims to the available support.
- Disciplinary measures implemented at the organisational level should comply with national legal requirements to minimise the risk of litigation on procedural grounds.
- Adopt and communicate a zero-tolerance stance towards harassment, intimidation, misogyny, discrimination, and violence.
- Internal educational programmes on sexual and gender-based harassment may help prevent its occurrence or encourage victims to report. Place special emphasis on educating supervisors and staff in managerial roles to highlight not

only the risks and the importance of addressing GBV, but also the internal procedures in place. They should also be trained on the importance of ensuring a safe working environment.

- Foster a culture of gender equality in the workplace grounded in respect for colleagues. Managers and supervisors should understand the normalisation of deviance, a social process in which bad, unsafe, or unethical behaviour gradually becomes accepted as normal.
- The employer must ensure compliance with all legal provisions that seek to guarantee a violence-free workplace, gender equality, and non-discrimination. Safeguarding these standards not only helps retain employees but also helps attract new employees.



When an employee is a victim of GBV, but the perpetrator is not an employee

- Employers do not have jurisdiction over a perpetrator (such as a partner) of an employee, even if the act occurs while the employee is working from home. This limits the employer's sphere of influence in internal disciplinary procedures.
- Nonetheless, an employer can assist if an employee confides in their superior or any other colleague that they are suffering from GBV outside the place of work. The relevant internal support service should still apply and, when and where possible, assist the employee with special arrangements.

- It is important to be aware of possible forms of harassment, including technology-enabled monitoring or control, stalking, unwanted contact at work, and misuse of workplace information. For example, an abusive partner might repeatedly call the employee at work, use shared accounts, track devices, or attempt to obtain the employee's work schedule.
- The employer should support the victim in seeking relevant support available from third-party organisations and national authorities.
- To ensure a safe working environment, the employer must prevent the non-employee perpetrator from entering company grounds, office buildings, or other facilities. When possible, update security teams on the high risk of such potential trespassing.
- Employers are encouraged to train supervisors and managers to recognise signs of abuse, especially when an employee does not report, and to respond with empathy, while respecting the survivor's autonomy and confidentiality.
- Customer care staff may also be at risk of GBV, particularly from unwanted comments by clients. Employers must clearly communicate a zero-tolerance policy to both clients and employees to give employees confidence that their employer will back them. When possible, conduct risk assessments to identify which roles may expose workers to third-party GBV by clients. Based on these assessments, implement appropriate preventive measures. Train supervisors to respond if they notice employee harassment.

General Recommendations in relation to Deepfake and Digital GBV

- Anyone can potentially be targeted by sexually explicit deepfake or synthetic media, regardless of gender, age or occupation. This is why businesses should, where possible, collaborate with organisations focused on internet safety and victim support to raise awareness.
- Workplaces should update their sexual harassment policy to include deepfake pornography among the listed types of sexual harassment. This should also include procedures for dealing with employees accused of creating such video or imagery. Explicitly include online and technology-facilitated violence and harassment within workplace policies.
- Implement a Standalone AI Acceptable Use Policy governing employee use of AI tools on company systems and personal devices, where such use affects the workplace. Define what's permitted, what's prohibited, and the consequences.

- Where possible, establish procedures to properly document and preserve digital evidence from work-related devices when requested by investigative authorities.
- Train managers and supervisors to recognise that AI-generated harassment is real harassment. Train them to recognise, report, and escalate it. A failure to respond appropriately to reported or observed AI-generated harassment from work colleagues may expose the organisation to legal, regulatory, reputational or other consequences, depending on the circumstances and applicable law.
- To ensure these policies remain effective, implement simple monitoring and evaluation methods. For example, conduct anonymous staff surveys regularly to assess awareness of reporting procedures and confidence in the response process. Track the number and types of reported incidents and gather feedback on outcomes. This approach will allow leadership to identify gaps, monitor trends, and make ongoing improvements to policy implementation.
- Establish a reporting mechanism for employees to report AI-generated harassment. Once a report is made, investigate promptly and document thoroughly. The adequacy of the response and procedure can be central to any subsequent litigation.
- As new EU and national legislation is implemented, employers should keep abreast of proposed legislation, contribute to the discussion where relevant, and ensure full compliance upon adoption.
- Recognise and understand the potential risks of modern technologies, such as AI management or algorithmic decision-making, in perpetuating violence at work. Ensure that such systems do not enhance gender bias and that certain tools, such as surveillance tools, are not used by certain users in a harassing way that leads to highly invasive and potentially discriminatory digital surveillance.

Gender-based violence is a whole-of-society challenge, and The Malta Chamber encourages local enterprises to partner with support service organisations that assist victims of GBV and to incorporate GBV into their Corporate Social Responsibility.

National Legislation

As already indicated in the recommendations, it is important that employers are aware of national legislation, especially that which imposes obligations on them. Employers are encouraged to ensure compliance with such legislation and, where possible, to include references to it in internal policies. Moreover, whenever new legislation or amendments

are proposed, employers should be aware of such proposals so as to provide their feedback and ensure that any legislative proposal is enforceable and does not provide for unrealistic measures.



Employment and Industrial Relations Act (Chapter 452)

Article 29 (1) It shall not be lawful for an employer or an employee to harass another employee or to harass the employer by subjecting such person to any unwelcome act, request or conduct, including spoken words, gestures or the production, display or circulation of written words, pictures or other material, which in respect of that person is based on sexual discrimination and which could reasonably be regarded as offensive, humiliating or intimidating to such person.

(2) It shall not be lawful for an employer or an employee to sexually harass another employee or the employer (hereinafter in this article referred to as "the victim") by:

(a) subjecting the victim to an act of physical intimacy; or

(b) requesting sexual favours from the victim; or

(c) subjecting the victim to any act or conduct with sexual connotations, including spoken words, gestures or the production, display or circulation of written words, pictures or other material where –

(i) the act, request or conduct is unwelcome to the victim and could reasonably be regarded as offensive, humiliating or intimidating to the victim;

(ii) the victim is treated differently, or it could reasonably be anticipated that the victim could be so treated, by reason of the victim's rejection of or submission to the act, request or conduct

Article 29A.(1) Violence and harassment in a work environment shall be prohibited. Employees and employers shall endeavour to respect each other's right to a work environment free from violence and harassment [...]

3) It shall not be lawful for an employer or an employee to act towards an employee, the employer, another employee or a prospective employee in a manner that is equivalent to violence and harassment in a work environment. Such actions may take any form, including but not limited to, requests, conduct, behaviour or interactions, whether physical, remote or online, and whether expressed orally, in writing, through images or by any other means or materials.

(4) It shall not be lawful for an employer or an employee to give rise to a circumstance or create an environment that permits or could permit violence or harassment in a work environment, or that may cause an employee, the employer, another employee or a prospective employee to feel uncomfortable or intimidated, or to be subjected to an offensive or abusive atmosphere, or that breaches their right to a work environment free from violence and harassment.

Council of Europe Convention on Preventing and Combating Violence against Women and Domestic Violence (Istanbul Convention)

The Istanbul Convention is the most comprehensive legally binding international treaty addressing violence against women and domestic violence. It recognises violence against women as a form of discrimination and a human rights violation. It calls on countries to effectively address sexual harassment and to provide support measures for victims, among other things. While the convention is legally binding on the State, it recognises the role of other stakeholders. In fact, Article 17 – Participation of the private sector and the media states:

Parties shall encourage the private sector, the information and communication technology sector and the media, with due respect for freedom of expression and their independence, to participate in the elaboration and implementation of

policies and to set guidelines and self-regulatory standards to prevent violence against women and to enhance respect for their dignity.

Parties shall develop and promote, in co-operation with private sector actors, skills among children, parents and educators on how to deal with the information and communications environment that provides access to degrading content of a sexual or violent nature which might be harmful.



Directive (EU) 2024/1385 on combating violence against women and domestic violence

Directive (EU) 2024/1385 specifically addresses violence against women and domestic violence. It sets minimum rules for the criminalisation of certain forms of violence, strengthens victims' rights to protection, support and access to justice, and promotes coordinated prevention measures across Member States. The Directive recognises that gender-based violence can affect victims' participation in employment and economic independence. Although it does not impose direct obligations on employers, it encourages a coordinated institutional response that includes workplaces, particularly in supporting victims and addressing sexual harassment where relevant. Any employer-specific duties arise primarily from national implementation and interaction with existing occupational safety and equality legislation.

Directive 2006/54/EC on equal opportunities and equal treatment of men and women in matters of employment and occupation

This consolidates EU rules on equal treatment between women and men in employment. It defines harassment and sexual harassment as forms of sex discrimination prohibited under EU law. Regarding workplace GBV, it requires Member States to prohibit such conduct and to provide effective legal remedies. While the Directive does not directly oblige employers to adopt specific workplace policies, it calls on Member States to encourage employers to take preventive measures, including awareness-raising and procedures to prevent harassment and sexual harassment in the workplace.

Directive 89/391/EEC on the introduction of measures to encourage improvements in the safety and health of workers at work

This directive sets out the general framework for protecting workers' health and safety. Although it does not specifically address gender-based violence, its broad duty to ensure workers' safety includes managing psychosocial risks that may arise from violence or harassment at work. Employers must assess workplace risks, implement preventive measures, provide information and training, and ensure a safe working environment. These obligations provide an important legal basis for addressing workplace violence, including GBV where it poses health and safety risks.

Below is a list of entities and organisations that can offer their services/support [List as of October 2026]:

Police Gender-Based & Domestic Violence Unit 22942717 22942777 gbdv.police@gov.mt	Migrants Commission 21222644 info@migrants.mt https://migrants.mt/refer	National Victim Support Line For Victims Of Crime-Malta 21228333 info@victimsupport.org.mt
Police Crime Stop Number 119	Police Emergency Number 112	Dar Emmaus 21552390
Legal Aid Malta Agency 22471500 info.legalaidmalta@gov.mt	Aġenzija Appoġġ 22959000 appogg@gov.mt	Rainbow Support Service (LGBTIQ+) 79430006 support@maltagayrights.org
National Support Line 179	Fondazzjoni Dar Il-Hena 27888211	Dar Merħba Bik 21440035
Mental Health Services (Psychology) 23304313	Women's Rights Foundation 80062149 info@wrf.org.mt	Victim Support Malta 21228333 info@victimsupport.org.mt
Dar Santa Bakhita 27444676	Soar Support Group 21808981 info@antidemalta.org	YMCA 27674278 info@ymcamalta.org

Child Protection Services (FSWS)

22588900

<https://fsws.gov.mt/mt/pages/ReportAbuse>

Victim Support Agency

25689700

victimsupport.police@gov.mt

Social Work Unit Gozo

22156630

socialworkunit.mgoz@gov.mt

**Aġenzija Appoġġ Revenge Porn
Helpline**

1779

Real-life stories

Story 1

In April 2026, the BBC reported that pupils in Scottish schools are increasingly using artificial intelligence to generate sexual and violent deepfake images of their teachers, which are then widely circulated across social media platforms. This often begins as a misguided attempt at humour before rapidly escalating into a darker, targeted form of harassment in which likenesses are inserted into pornographic footage. The ease with which this profound harm is inflicted is particularly alarming. As teachers' union officials highlight, a perpetrator only needs a basic set of instructions and a single photograph to place a victim's likeness into a pornographic film.

Because these powerful tools are so accessible and frequently used outside school hours, the situation has been described as an 'open season' on educators, where students feel they can commit these acts without any 'comeback' or consequence. The psychological effect on these workers is devastating. The BBC highlights that numerous teachers have been signed off work sick, unable to cope with the humiliation of having such degrading images shared throughout their schools. In specific instances, victims have found it 'intolerable' to return to their workplace after being sexualised and shamed in front of their entire student body. This form of digital violence is reportedly pushing some staff 'over the edge', creating a toxic environment where the lack of boundaries leads to severe mental health crises and the potential abandonment of their teaching careers.

Story 2

In the Spanish town of Almendralejo, more than 20 local girls, aged 11 to 17, had fully clothed photos of themselves from social media doctored with AI to produce fake naked images. One of the mothers of a 14-year-old recounted how "One day my daughter came out of school and she said 'Mum, there are photos circulating of me topless'. I asked her if she had taken any photos of herself nude, and she said, 'No, Mum, these are fake photos of girls that are being created a lot right now, and there are other girls in my class that this has happened to as well'." These types of cases have increased over time, and despite being fake photos, they leave victims with reputational and social damage, emotional trauma, and an escalation of abuse in the real world, where too often victims are ridiculed in their day-to-day lives.



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