

AUDIT REPORT:

ANALYSIS OF SYSTEMS AND PRACTICES FOR THE PREVENTION AND COMBAT OF HARASSMENT IN FEDERAL UNIVERSITIES

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DEPARTMENT OF EXTERNAL
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AUDIT DEPARTMENT FOR EDUCATION,
CULTURE, SPORTS AND HUMAN RIGHTS
(AUDEDUCAÇÃO)





AUDIT REPORT ON SYSTEMS AND PRACTICES FOR THE PREVENTION AND COMBAT OF HARASSMENT IN FEDERAL UNIVERSITIES

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Rapporteur: Minister Aroldo Cedraz

Type of Audit: Performance Audit.

Original Act: Decision 519/2024-TCU- Full Court Session, Rapporteur Minister Aroldo Cedraz (TC 066.141/2024-2)

Objective of the Audit: To evaluate the existence and potential outcomes of systems and practices for the prevention and combat of harassment in federal universities, in accordance with relevant standards and best practices.

Audit period: April 1st, 2024 to October 25th, 2024

Team Composition during the Audit Phases

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Act of Designation: Notification Letter - AudEducação 150, dated April 1, 2024, and Notification Letter - AudEducação 304, dated June 3, 2024 (Amendment) – Design the Audit Phase; Notification Letter - AudEducação 327, dated June 14, 2024, and Notification Letter - AudEducação 569, dated September 20, 2024 (Amendment) - Conducting the Audit and Writing the Audit Report Phases.

Audited Entities: 69 Federal Universities

Ministerial Affiliation: Ministry of Education

Affiliation with the TCU: Audit Department for Education, Culture, Sports and Human Rights (AudEducação)

Related Processes: TC 012.525/2022-7 (rapporteur Minister Aroldo Cedraz) – Performance Audit Process (Fiscalis Record 132/2022), aimed at evaluating the adequacy of the Harassment Prevention System of Caixa Econômica Federal (Caixa), pending the rapporteur minister's statement, whose methodological design contributes to this audit process.

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WHAT THE TCU AUDITED?

The TCU evaluated the systems and practices for the prevention and combat of harassment adopted by the 69 federal universities in Brazil.

The analyses covered the fiscal years 2023 and 2024.

Why Did the TCU Conduct This Work?

Increase of 44.8% in the number of court cases judged on sexual harassment between 2021 and 2023 (TST, 2024).

During this period, the courts received more than 360,000 new cases involving workplace harassment (TST, 2024).

Universities are among the main environments where harassment occurs (KPMG, 2023).

Between 2022 and March 2024, 641 corrective processes on harassment were opened in federal universities (CGU, 2024).

During this period, harassment was reported in 57 of the 69 federal universities (GCU, 2024).

Only 10% of harassment cases are reported (Brito et al., 2022).

WHAT THE TCU FOUND?

The audit revealed that 41 federal universities (approximately 60%) do not have an institutionalized policy (or sectoral plan) for the prevention and combat of harassment.

Figure 1 – Federal Universities Without an Institutionalized Policy for the Prevention and Combat of Harassment



Source: Own elaboration.

Among the 28 federal universities that have an institutionalized policy, 19 were found to have gaps concerning the regulatory provisions on harassment.

It was found that 50 federal universities do not have training programs on harassment for the university community; 51 do not have protocols for welcoming and guiding complaints to avoid the revictimization of individuals in situations of harassment; 55 do not have guidelines to ensure that investigation and accountability teams are composed and conduct processes involving harassment with a gender perspective.

WHAT IS BEING PROPOSED?

The following **recommendations** are being proposed for consideration by higher authorities, among others, to federal universities:

- For those that do not yet have a policy for the prevention and combat of harassment, to take steps towards its institutionalization, based on reference standards and identified best practices.
- Measures to improve actions and strategies for dissemination, training, and capacity building within the university community on the topic of harassment.
- Adoption of measures for the definition and structuring of internal bodies for the reception, guidance, and referral of harassment complaints.

WHAT ARE THE EXPECTED BENEFITS?

Creation and institutionalization of policies for the prevention and combat of harassment in federal universities that do not yet have them, and updating to best practices and reference standards for those that already have policies but can improve them.

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I. INTRODUCTION

1. This is a performance audit aimed at evaluating the existence and potential results of systems and practices for the prevention and combat of harassment in federal universities, considering reference standards and best practices.

2. The specific objectives defined for the audit, based on risk assessment, were:

a) To analyze the maturity level of the process of institutionalizing harassment prevention and combat policies by federal universities, especially regarding the participation of the university community in the regulation and dissemination of the policy;

b) To evaluate the strategies and practices for the prevention and combat of harassment adopted by federal universities, regarding the effectiveness of dissemination, training, reporting, and support instruments for those affected by harassment; and

c) To assess the practices and procedures adopted for the investigation and accountability in cases of harassment within federal universities.

3. Regarding the audit issue, it is noteworthy that, according to data from the Superior Labor Court (TST, 2024), the volume of cases judged on sexual harassment increased by 44.8% between 2021 and 2023, and those on moral harassment increased by 5%. During this period, the labor courts received more than 360,000 new cases involving aspects of harassment in the workplace.

4. This social issue is also evident in public universities. A study conducted by KPMG (Klynveld Peat Marwick Goerdeler) in 2023, titled “Mapa do Assédio no Brasil” (KPMG, 2023), showed that educational institutions are among the main environments where harassment occurs (with approximately 8% of the total reported cases).

5. According to data from the Office of the Comptroller General (CGU), in a panel on the correctional system in the Federal Executive Branch (CGU, 2024), from 2022 to March 2024, 641 correctional processes involving moral and sexual harassment of faculty/staff at federal universities were initiated. During this period, in 57 of the 69 federal universities in Brazil, there were reports of harassment (moral and/or sexual) within the mentioned correctional system.

6. However, despite the cases pointed out by the CGU involving harassment, there is still a low number of reports of this type of violence. A study published in 2022 on harassment at the Federal University of Rio Grande do Sul (UFRGS) indicated that only 10% of cases are reported, revealing a high number of underreporting (BRITO *et al.*, 2022).

7. Considering the aspects related to the problem and based on the identified risks, after defining the proposed specific objectives, the following guiding questions for the audit work were developed, based on the risks identified during the planning phase:

a) Question 1: In federal universities, is there an **institutionalized and disseminated policy for the prevention and combat of harassment within the university community**, formulated through collective participation and involvement in the discussion, regulation, and dissemination of behaviors characterized as harassment, in accordance with reference standards on the subject (CNJ Resolution 351/2020; TCU Plenary Decision 456/2022; Law 14,540/2023; Law 14,457/2022)?

b) Question 2: Within federal universities, are institutional campaigns and training programs developed to disseminate information to the university community, provide technical training for support teams, and guide individuals affected by harassment situations and investigate cases, based on reference standards (CNJ Resolution 351/2020; Law 14,540/2023; Law 14,457/2022)?

c) Question 3: Are the reporting channels and internal units for reception, listening, monitoring, and guidance for individuals affected by harassment situations within federal universities prepared with service protocols and physical and/or remote structures for formalizing complaints, aiming to ensure effective service to these individuals and effective investigation of reported cases, in accordance with reference standards (CNJ Resolution 351/2020; Law 14,540/2023; Law 14,457/2022; CNJ Resolution 492/2023; TCU Plenary Decision 456/2022)?

d) Question 4: Were the administrative processes for investigating and holding accountable harassment cases in federal universities conducted by duly qualified and authorized personnel, observing due legal process, with appropriate evidence-gathering phases for the reported case and without interference from retaliation and/or corporatism, promoting a gender perspective analysis of harassment cases, based on reference standards (Law 14,540/2023; CNJ Resolution 351/2020; CNJ Resolution 492/2023; Law 8,112/1990 and Binding Opinion 15/2023/CONSUNIAO/CGU/AGU)?

e) Question 5: Did the administrative processes for investigating and holding accountable harassment cases in federal universities effectively result in the punishment of those found guilty, after the conclusion of the investigation by the committees, ensuring the principles of due legal process and in accordance with relevant legal and regulatory terms, reducing the sense of impunity within the university community, based on reference standards (Law 14,540/2023; CNJ Resolution 351/2020; CNJ Resolution 492/2023; Law 8,112/1990 and Binding Opinion 15/2023/CONSUNIAO/CGU/AGU)?

8. The main criteria/references that guided the conduct of the audit work were: a) Laws 14,450/2023 and 14,457/2022; b) Decree 12,122/2024; c) ILO Convention 190; d) TCU Plenary Decision 456/2022 (Rapporteur Walton Alencar Rodrigues); e) CNJ Resolutions 351/2020 and 492/2023.

9. This audit action is aligned with the strategic objectives outlined in the Strategic Plan (PET) 2023-2028 and the TCU Management Plan 2023-2025 (TCU Ordinance 80, dated 12/4/2023), falling under Strategic Objective 3 – Effectiveness of public policies and Operational Objective 3 – contributing to the effectiveness of public policies.

10. The audit was conducted in accordance with the TCU's audit standards as outlined in the Performance Audit Manual approved by Segecex Ordinance 18/2020 and under the mentorship of the Equal Futures Audit program, following the Equity Framework model and in line with the Performance Audit ISSAI Implementation Handbook, both from the Intosai Development Initiative (IDI).

11. Additional details about the methodology adopted for the execution of this audit work can be found in Appendix A and in the audit plan, with the respective planning matrix (document 986).

12. This audit report is organized into six sections, including this introductory section. Section II presents an overview of the audited object. In Section III, with the respective sub-items, the main findings of the audit are presented. Section IV highlights the best practices identified during the work. Sections V and VI are dedicated, respectively, to the conclusions of the work and the proposed recommendations.

13. The appendices contain the detailed methodology (Appendix A), the analysis of the managers' comments (Appendix B), and the proposed recommendations (Appendices C and D).

II. GENERAL OVERVIEW OF THE AUDIT TOPIC

II.1 Objectives of the Harassment Prevention and Combat Policy

14. The prevention and combat of harassment in federal universities, based on legislation on sexual harassment (Law 14,540/2023), impose objectives to be achieved:

a) Institutionalize a policy for the prevention and combat of harassment, with effective participation and awareness from the university community;

b) Train/guide the university community on the topic, especially by informing them about which behaviors constitute harassment and the procedures to be followed in case of harassment; and

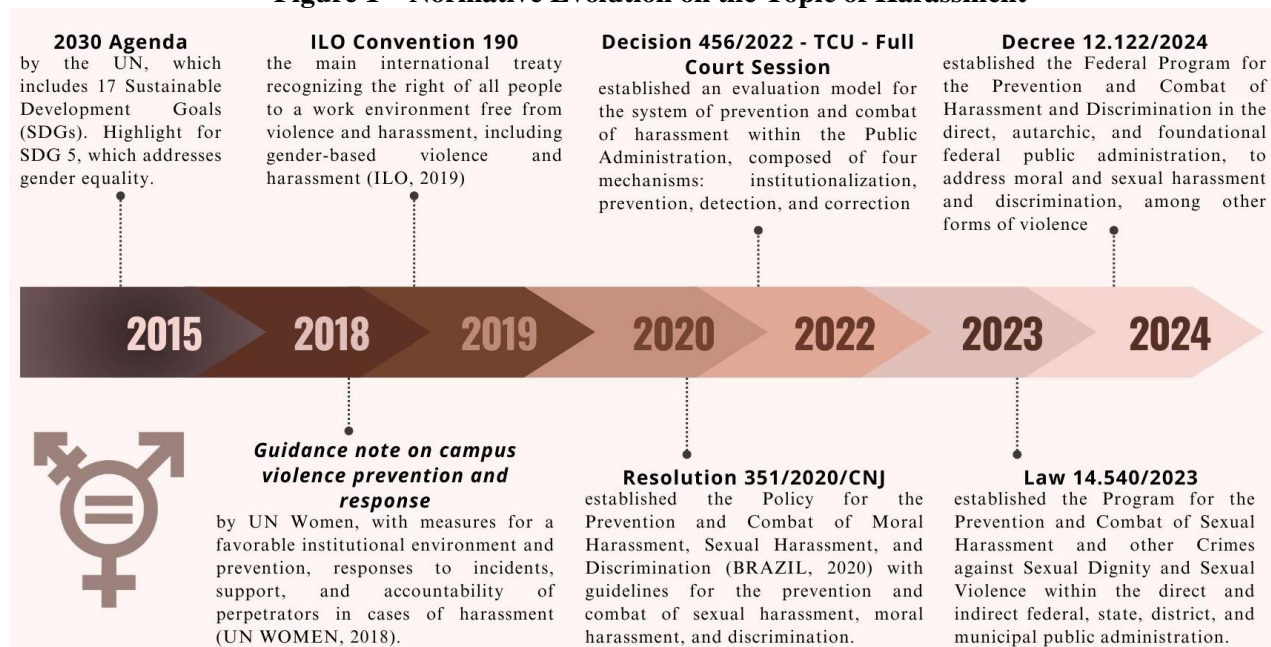
c) Adopt practices and procedures for welcoming individuals affected by harassment, receiving complaints, forming teams to investigate behaviors, and consequently holding offenders accountable, aiming to prevent the recurrence of abusive behaviors.

15. Decree 12,122/2024 established the federal program for the prevention and confrontation of harassment and discrimination, aimed at addressing all forms of violence arising from work relationships, especially moral and sexual harassment and discrimination.

II.2 History and Normative Evolution on the Topic of Harassment

16. The debate on the topic of harassment has seen significant normative evolution over the past ten years, both globally (addressing gender equality and the combat of workplace harassment) and domestically (with the enactment and promulgation of laws and other regulations related to the prevention and combat of harassment). Figure 1 summarizes the process of normative evolution on harassment.

Figure 1 – Normative Evolution on the Topic of Harassment



Source: Own elaboration (AudEducação/TCU)

II.3 Beneficiaries

17. The systems and practices for the prevention and combat of harassment within federal public universities should encompass all those who have any connection with the university

environment, both in terms of preventive practices and in the reception and investigation process and accountability. Therefore, the beneficiaries are:

- a) Permanent public servants (administrative technicians and faculty), appointed through public competition;
- b) Temporary staff (administrative technicians with temporary positions and/or substitute professors);
- c) Contracted employees, service providers in federal universities;
- d) Students, whether from undergraduate or graduate programs; and
- e) Interns and scholarship holders.

II.4 Responsible Parties

18. Article 6 of Decree 12,122/2024 assigns the highest authorities of the agencies and entities the responsibility for instituting and monitoring the plans for the prevention and confrontation of harassment and discrimination. In this regard, the rectors, pro-rectors, and heads of internal units of federal universities are responsible for developing internal actions within each institution that can reduce cases of harassment in the institutional environment.

II.5 Goals and Performance Indicators

19. Although there are no specific goals and performance indicators related to the systems and practices for the prevention and combat of harassment in federal universities, based on Article 5 of Law 14,540/2023, all federal public institutions are required to develop actions and strategies aimed at the prevention and confrontation of sexual harassment and other forms of sexual violence, i.e., to develop an institutional policy related to the topic.

20. Thus, the main goal is for all federal public institutions, including federal universities, to have implemented and operational actions and strategies for the prevention and combat of sexual harassment, without prejudice to addressing all forms of harassment in the workplace and academic environment. Based on Article 6 of ILO Convention 190 and Decree 12,122/2024, actions and strategies should also cover moral harassment.

21. Additionally, supported by Law 14,540/2023 and Decree 12,122/2024, it is important to highlight that there are guidelines that can serve as qualitative indicators (or items to be fulfilled by institutions) that guide the effectiveness of harassment prevention and combat policies, namely:

- a) Mapping and defining behaviors that constitute harassment within the institution, with clarification on the elements that constitute harassment;
- b) Providing educational and informational materials on examples of behaviors that constitute harassment;
- c) Disseminating relevant legislation on harassment and policies for protection, reception, assistance, and guarantee of rights for individuals subjected to harassment;
- d) Creating training programs involving the topic of harassment;
- e) Publicizing accessible channels for reporting harassment practices; and
- f) Establishing procedures for handling complaints, reports, and investigation of harassment cases.

II.6 Control Systems

22. Regarding the systems for the prevention and combat of harassment in federal universities, the CGU's Lilac Guide states that the Public Administration must have an ombudsman capable of receiving complaints in an empathetic, objective, and victim-centered manner. Therefore, the ombudsman offices are responsible for the first stage of internal control (BRASIL, CGU, 2023).

The correctional systems and integrity commissions develop internal control regarding the conduct of investigation processes. The Office of the Comptroller General, through the Directorate of Articulation, Monitoring, and Supervision of the Correctional System of the Federal Executive Branch, supervises the investigation processes and standardizes procedures.

III. AUDIT FINDINGS

23. This section will detail the audit findings identified and evidenced during the execution phase of the oversight work.

24. It is noteworthy that there were four (4) risks described in the audit plan (document 986, pp. 13-14) that did not materialize into audit findings, based on the information provided by the federal universities, namely:

a) Due to evidentiary difficulties and the recording of abusive/harassing behaviors and/or the absence/limitation of mechanisms for collecting and processing complaints that prevent retaliation against the complainant and/or those conducting the investigation and accountability process, there may be limitations or compromises in the reach of the complaint, investigation, and accountability procedures, leading to a sense of impunity, impacting the effectiveness of the policy;

b) Due to corporatism among employees or institutional corporatism and/or divergences between institutional instances in handling complaints, there may be delays in the procedural conduct and/or non-punishment of offenders in proportion to the behaviors practiced, increasing the sense of impunity, reducing the effectiveness of the policy for preventing and combating harassment;

c) Due to fear of retaliation by offenders and/or peers, as a result of investigation and accountability, there may be difficulties in forming new internal investigation teams, creating challenges in the investigation processes, impacting the continuity of the policy for preventing and combating harassment; and

d) Due to the judicialization of administrative processes for investigating harassment complaints, there may be annulment of imposed punishment or the imposition of disproportionate penalties to the behaviors practiced, generating a sense of impunity, promoting the return of the offender to activities and consequent discomfort in the academic environment, impacting the effectiveness of the policy for preventing and combating harassment.

25. Similarly, it is noteworthy that no audit findings were evidenced for audit question 5: “Did the administrative processes for investigating and holding accountable harassment cases in federal universities effectively result in the punishment of those found guilty, after the conclusion of the work by the investigation committees, ensuring the principles of due process and in accordance with the relevant legal and regulatory terms, reducing the sense of impunity within the university community, based on the reference standards (Law 14.540/2023; CNJ Resolution 351/2020; CNJ Resolution 492/2023; Law 8.112/1990 and Binding Opinion 15/2023/CONSUNIAO/CGU/AGU)?”.

26. Based on the results of the Reference Panel that discussed the Findings Matrix, and after the stage of managers’ comments on the proposed actions; it was decided that the audit findings presented preliminarily to the managers should be maintained in the same manner in this report, with some textual adjustments. The adjustments made and their respective justifications are detailed in Appendix A – Analysis of managers’ comments.

27. The following topics describe the five audit findings. The first two findings refer to the absence/gaps in the process of institutionalizing the policy for preventing and combating harassment. Finding III.3 reveals weaknesses in training, dissemination, and education actions on the topic of harassment. Findings III.4 and III.5 point to gaps in the definition and structuring of internal instances

for receiving, guiding, and forwarding complaints involving harassment, as well as in defining flowcharts/protocols for forwarding complaints and investigating processes involving harassment cases.

III.1 Absence of an institutionalized policy for preventing and combating harassment within the university community, in 60% of federal universities.

28. **In 41 federal universities, which corresponds to approximately 60% of a total of 69, there is no institutionalized policy for the prevention and combat of harassment. Figure 2 illustrates the situation found.**

Figure 2 - Federal universities without an institutionalized policy for preventing and combating harassment



Source: Own elaboration (AudEducação/TCU)

29. As stated in the individualized analysis in document 987, the following institutions do not have an institutionalized policy for preventing and combating harassment: Federal Universities of Acre (UFAC), Amazonas (UFAM), Agreste de Pernambuco (Ufape), Bahia (UFBA), Ceará (UFC), Cariri (UFCA), Catalão (UFCat), Health Sciences of Porto Alegre (UFCSPA), Semi-Arid Region (Ufersa), Espírito Santo (UFES), Fluminense (UFF), Southern Border (UFFS), Maranhão (UFMA), Minas Gerais (UFMG), Mato Grosso (UFMT), Northern Tocantins (UFNT), Paraíba (UFPB), Pernambuco (UFPE), Pelotas (Ufpel), Piauí (UFPI), Paraná (UFPR), Rural Amazon (UFRA), Rio de Janeiro (UFRJ), Rural Pernambuco (UFRPE), Rural Rio de Janeiro (UFRRJ), Sergipe (UFS), Southern Bahia (UFSB), Santa Catarina (UFSC), São João del-Rei (UFSJ), Tocantins (UFT), Triângulo Mineiro (UFTM), Alfenas in Minas Gerais (Unifal-MG), Amapá (Unifap), São Paulo (Unifesp), Western Pará (Ufopa), Southern and Southeastern Pará (Unifesspa), Latin American Integration (Unila), International Integration of Afro-Brazilian Lusophony (Unilab), State of Rio de Janeiro (Unirio), São Francisco Valley (Univasf), and Federal Technological University of Paraná (UTFPR).

30. Of these federal universities, 39 explicitly stated in their responses to the audit request that they still do not have an institutionalized policy for preventing and combating harassment (document 987).

31. Although UFRA has some initiatives related to the theme of harassment directed at employees, in a chapter of the Health Promotion (PS) and Quality of Work Life (QVT) Policy (Superior Administration Council Resolution 462, dated 1/6/2021), this does not constitute an institutionalized policy for preventing and combating harassment, especially as it does not cover the entire university community. Resolution 462/2021 restricts the support of students in harassment cases only when employees are involved (art. 28 of the aforementioned norm).

32. Regarding Ufopa, despite the absence of a response to the audit request, but with a statement in the managers' comments stage (document 1184), there is an indication on the institutional website of a regulation on moral harassment and the institution's own acknowledgment that it does not comply with the legislation, especially the requirements of Law 14.540/2023 and Decree 12.122/2024, and does not cover the entire university community. In this sense, the institution does not have an institutionalized policy, especially concerning sexual harassment.

33. The Federal University of Campina Grande (UFCG) did not send a response to the audit request letter, but there are elements on the institutional website that prove the existence of a policy for preventing and combating harassment.

34. UFAM has some initiatives related to the theme of harassment, especially involving moral harassment of employees, but the institution itself admits that there is no institutionalized policy for preventing and combating harassment.

35. Focus groups with students, outsourced workers, and employees from the following institutions, visited during the execution of the oversight work, reinforced the absence of an institutionalized policy for preventing and combating harassment and/or participation in its development: UFAM, UFAC, UFMA, UFMG, UFPE, and UFSC, according to the descriptive summary of on-site visit activities, contained in each individualized analysis (document 987).

36. In the absence of institutionalization, it is not possible to prove the participation and involvement of the university community in the discussion, regulation, and dissemination of behaviors characterized as harassment in the aforementioned institutions. Additionally, there is no definition of internal instances directed at welcoming and guiding individuals in situations of harassment or defining a training program on the subject.

37. The lack of an institutionalized policy for preventing and combating harassment contradicts the guidelines of ILO Convention 190, as well as the provisions of Laws 14.540/2023 and 14.457/2022 and Decree 12.122/2024. Other references such as Decision 456/2022-TCU/Plenary (Rapporteur Walton Alencar Rodrigues) and Resolution 351/2020 of the National Council of Justice reinforce the importance of institutionalizing a policy for preventing and combating harassment.

38. In the conception of an institutionalized policy for preventing and combating harassment, based on the guidelines of ILO Convention 190 (the basis for Laws 14.457/2022 and 14.540/2023), there are principles that suggest practices to be adopted by signatory countries through their public or private organizations/institutions:

- a) legal prohibition of violence and harassment;
- b) ensuring that relevant policies address violence and harassment;
- c) adopting a comprehensive strategy to implement measures to prevent and combat violence and harassment;
- d) establishing or strengthening inspection and monitoring mechanisms;
- e) ensuring access to resources and support for victims;
- f) providing for sanctions;

g) developing tools, guidance, education, and training, and raising awareness, in accessible formats as appropriate; and

h) ensuring effective means of inspection and investigation of cases of violence and harassment, including through labor inspections or other competent bodies.

39. Thus, based on these principles and the governing legislation (Law 14.540/2023; Law 14.457/2022; Decree 12.122/2024), the **institutionalization of a policy for preventing and combating harassment presupposes**, in summary: commitment from senior management to the theme, definition of harassment behaviors, development of actions and strategies in a comprehensive manner, protocols/flowcharts for welcoming and guiding individuals in situations of harassment, as well as for investigating abusive behaviors (with a gender perspective when it comes to gender-based violence), training programs, dissemination, and education on the theme. All actions and strategies require integration of internal instances (management commitment in its multiple dimensions).

40. Considering the statement from the Federal University of Health Sciences of Porto Alegre (UFCSA), in managers' comments on the preliminary proposals for action (document 1142), it is worth highlighting the nomenclature adopted by Decree 12.122/2024, published during the oversight work, which began to require the adoption of a sectoral plan defining actions and strategies for preventing and combating harassment, with identical objectives to the conception of an institutionalized policy on the theme.

41. The Ministry of Management and Innovation in Public Services (MGI), through MGI Ordinance 6.719, dated 9/13/2024, published on 10/1/2024, instituted the Federal Plan for Prevention and Confrontation of Harassment and Discrimination in the Direct Federal Public Administration, its Autarchies, and Foundations (PFPEAD). The aforementioned ordinance established that the sectoral plans developed by public administration bodies and entities must observe the guidelines of the Federal Plan.

42. In this sense, **the sectoral plans must follow the guidelines contained in MGI Ordinance 6.719/2024**, to promote effective actions for prevention, welcoming, investigation, accountability, and conflict resolution to build work environments free from harassment, discrimination, and other types of violence, especially the guidelines in Annexes I and II of the aforementioned ordinance.

43. **In this aspect, the terms “institutionalized policy” and “sectoral plan” can be adopted in the context of defining actions and strategies for preventing and combating harassment in federal universities**, especially in those that do not yet have an institutional policy on the issue, avoiding the existence of two distinct documents for institutionalizing the theme.

44. Among the **possible causes** for the absence of an institutional policy for preventing and combating harassment, the following can be pointed out:

a) the governing legislation is recent (Law 14.540/2023 was promulgated on 4/3/2023; Decree 12.122/2024 was promulgated on 7/31/2024), allowing little time for a broad collective discussion on the implementation of a harassment prevention policy;

b) on 3/13/2023, the Federal Executive Branch submitted the text of ILO Convention 190 to the Chamber of Deputies through the Message of Agreements, Conventions, Treaties, and International Acts (MSC) 86/2023 to ratify the convention into Brazilian legislation. However, the text only comes into force in Brazil after approval by both Houses of the National Congress (Chamber and Senate), which has not yet occurred as of October 2024;

c) in federal universities, there is an asymmetry in power relations between professors and technical-administrative staff and between professors and students, which can hinder the institutional debate for the approval of a policy for preventing and combating harassment.

45. Regarding the **effects of the absence of institutionalization** of actions and strategies involving the theme of harassment within federal universities, considering the already identified cases of harassment and the risk of new cases occurring, it may result in the limitation of preventive and corrective actions by the university community (actions of managers and investigation teams/committees, training, and forwarding of complaints by employees, students, and outsourced workers), who act according to the principle of legality. This limitation compromises the effectiveness of activities to combat harassment in the university environment, increasing the sense of impunity, the feeling of insecurity among members of the university community, especially women/LGBTQIAPN+ individuals.

46. Considering the described situation, it is **proposed to recommend** to the 41 federal universities identified in this analysis that they take measures to institutionalize a policy (or sectoral plan, according to the nomenclature of Decree 12.122/2024) for preventing and combating harassment, with the involvement and participation of the university community, aiming at defining behaviors, developing flowcharts/protocols for welcoming, guiding, reporting, and investigating/holding accountable harassment cases, with the definition of competencies of internal units related to the theme and guiding the procedural conduct with a gender perspective, as well as establishing a training and education program on harassment, with wide dissemination within the institution.

47. It is expected that the implementation of the proposed recommendation in federal universities will bring the following **benefits**:

a) Increase from 28 to 69 the number of federal universities with an institutionalized policy (or sectoral plan) for preventing and combating harassment;

b) Provide better definition and rationality to decisions on the theme involving harassment in the university for the entire university community;

c) Increase the effectiveness of actions to prevent and combat harassment in the university; and

d) Promote an increase in public perception of the relevance of combating harassment in the university environment.

48. Considering the absence of a response to the audit request by the Federal University of Campina Grande (UFCG), without a statement in the managers' comments stage, it is **proposed to inform** this institution that failure to comply with the diligence, within the set deadline and without justified cause, and the withholding of documents or information, in inspections or audits conducted by the Court, violates the provisions of art. 58, items IV and VI, of Law 8.443/1992 (Organic Law of the Federal Court of Accounts).

49. The proposal to inform about the irregularity aims to prevent the repetition of the omission in responding to information and/or document requests in the context of external control processes and audits conducted by the TCU.

III.2 Gaps in harassment prevention and combat policies (the drafting/approval process did not involve members of the university community, does not cover the entire university community, lacks protocols and flowcharts of the involved units)

50. Among the 28 federal universities with an institutionalized policy for preventing and combating harassment, 19 institutions have gaps concerning the regulatory provisions on the theme.

Gap



A gap is characterized by the absence of a critical part in a process, such as the absence of policies or programs, norms, actors, institutional mechanisms, processes and activities, or the unavailability of a benefit, service, or product, as well as the absence of service to certain groups of beneficiaries, users, and target audiences (FSDL Analysis Guide, Olacefs, TCU, 2023).

51. The federal universities: UFOB, UFPA, UFRGS, UFSM, UFU, and Unipampa, did not include the entire university community in the regulations of the policy for preventing and combating harassment.

52. At the universities Ufal, UFVJM, and Unipampa, there was no evidence of participation by the entire university community in the process of drafting and approving the policy for preventing and combating harassment.

53. The regulations concerning the actions and strategies of the universities Furg, UFABC, Ufal, UFDPAr, UFSM, UFGD, UFLA, Ufopa, and Ufscar do not have a protocol and/or flowchart defining the procedures for handling reports involving harassment cases.

54. In the policy for preventing and combating harassment at UFRGS, there are no guidelines for investigating cases involving outsourced workers, especially as respondents.

55. At UFRB, the policy for preventing and combating harassment, institutionalized by Consuni/UFRB Resolution 27, dated 7/7/2024, in its art. 12, excluded the possibility of anonymous reporting in cases where the complainant is the person experiencing harassment. However, after the preliminary proposal was sent, there was a regulatory change indicating the restriction (document 1199), with no need for additional measures.

56. At Ufop, there is no description of the admissibility stage of complaints. The regulation does not establish the sectors of the institution responsible for applying penalties and there is no integration with the internal correctional system. Regarding Ufop, based on the managers' comments on the individualized report (document 1132), there was a proposal to amend the regulations to address the deficiencies, with no need for additional measures.

57. In the Policy for Preventing and Combating Harassment at UFVJM, instituted by Consu/UFVJM Resolution 7, dated 4/1/2024, there is only a mention of sexual harassment, not covering moral harassment.

58. The audit procedures used and the nature of the audited object did not allow for precise conclusions on the causes of the audit findings regarding the gaps found in the process of institutionalizing actions and strategies for preventing and combating harassment in Federal Universities. However, the **possible causes** identified are listed below:

a) Law 14.540/2023 and Decree 12.122/2024, which began to require actions and strategies for preventing and combating harassment within the Federal Public Administration, are recent, from 2023 and 2024;

b) Strike movement that occurred in the first half of 2024 and lasted 69 days;

c) Decisions in collegiate bodies in federal universities require a maturation time, which delays the expansion of collective debate; and

d) Policies for preventing and combating harassment developed before the entry into force of Law 14.540/2023 and Decree 12.122/2024, needing to be adapted to the new legislation.

59. Regarding **the effects of the identified gaps in the policies for preventing and combating harassment within federal universities**, the following detriments to the actions and strategies for preventing and combating harassment within these educational institutions are highlighted:

a) The fact that the policy for preventing and combating harassment does not cover the entire university community and/or is restricted to sexual harassment compromises/limits the scope of the actions and strategies for preventing and combating harassment;

b) The limitation and/or absence of participation by the university community during the drafting and approval process of the policy undermines the legitimacy of the instituted regulation;

c) The absence of protocols with standardized operational procedures for preventing and combating harassment in federal universities results in a lack of guidance for the university community on the theme, inefficiency in prevention actions and in the processes of investigating harassment cases, as well as increasing the sense of impunity and the risks of revictimization;

d) The absence of the possibility of anonymous reporting in cases where the complainant is the person experiencing harassment increases the likelihood that the complainant will feel insecure and, therefore, less willing to report misconduct, which reduces the effectiveness of the policy for preventing and combating harassment;

e) The lack of detail on the stages involving the complaint and the lack of integration of internal instances can result in the loss of a systemic view of the process, from the complaint to the conclusion of the investigation of the reported fact, as well as in inadequate handling/forwarding and/or inconsistencies in the procedures and competencies involving harassment case reports.

60. Given the above, it is **proposed to recommend**:

a) To UFOB, UFPA, UFRGS, UFSM, UFU, and Unipampa to take measures to review the actions and strategies for preventing and combating harassment to ensure their reach to the entire university community, according to art. 3, §1 and art. 5, item I, of Decree 12.122/2024; Art. 5, item I, of CNJ Resolution 351/2020;

b) To Ufal, UFVJM, and Unipampa to adopt measures that promote the participation of the entire university community in the processes of monitoring and overseeing the policy (or sectoral plan, according to the nomenclature of Decree 12.122/2024), according to art. 4 and art. 5, item I, of Decree 12.122/2024; and

c) To UFVJM to take measures for the institutionalization of actions and strategies for preventing and combating moral harassment, with the involvement and participation of the university community, according to the guidelines of Decree 12.122/2024.

61. Regarding the actions for disseminating the policy, the recommendations will be described in finding III.3.

62. Concerning federal universities that do not have defined protocols and structures related to preventing and combating harassment, the recommendations will be made in findings III.4 and III.5, which specifically address the reception and handling of processes.

63. **The proposed recommendations are compiled, by university, in Appendix D.**

64. It is expected that with the implementation of the deliberation, the following benefits will be achieved:

a) The inclusion and participation of the entire community in the process of drafting and approving the policy for preventing and combating harassment expands the scope of actions and strategies, so that all groups are reached with their particularities and the different perspectives on the theme are properly addressed;

b) The definition of protocols and structures for preventing and combating harassment demonstrates maturity in the debate on the theme and evidences the institutional commitment to preventing and combating different types of violence, in addition to generating greater legal security for the university community; and

c) Increase from 8 to 28 the number of federal universities with policies for preventing and combating harassment that cover the entire university community, have protocols and flowcharts of the involved units, and include the participation of the university community in the moments of reviewing the referred policies.

III.3 Weaknesses in the dissemination of harassment prevention policies and protocols and in the technical training of support and guidance teams for individuals in situations of harassment.

65. **The analysis conducted in the 69 federal universities and the on-site visits carried out, as detailed in the consolidation of individual analyses (document 987), revealed the following weaknesses in training and dissemination actions on the theme of harassment: i) Absence of electronic dissemination of the harassment prevention policy and/or legislation and/or adopted protocols; ii) Absence of dissemination campaigns and/or an institutional training and education program on the theme of harassment; iii) Absence of specific training for investigation teams to conduct administrative processes involving harassment cases.**

66. It was observed that in 52 of these institutions, there is no effective dissemination of harassment prevention policies, applicable legislation, or adopted protocols on their institutional web pages, in non-compliance with art. 5, items IV and V, of Law 14.540/2023.

67. The absence of electronic dissemination of the harassment prevention policy and/or legislation and/or adopted protocols was observed in the following institutions: UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCG, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFG, UFJ, UFJF, UFMA, UFMG, UFMT, UFNT, UFOB, UFPB, UFPE, UFPel, UFPI, UFPR, UFR, UFRA, UFRB, UFRGS, UFRJ, UFRPE, UFRR, UFS, UFSC, Ufscar, UFSJ, UFSM, UFT, UFV, UnB, Unifap, Unifei, Unifesp, Unila, Unilab, Unir, Unirio, Univasf, and UTFPR.

68. Additionally, it was identified that in 50 federal universities, there are no dissemination campaigns and/or an institutional training and education program on the theme of harassment, which may include structured and regular educational actions, contrary to the provisions of art. 4 and art. 5, items II, VII, of Law 14.540/2023, and art. 2, item I, and art. 7, item I, of Decree 12.122/2024.

69. The universities in this situation are: Furg, UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCG, UFCSPA, UFDPAr, Ufersa, UFF, UFFS, UFJF, UFLA, UFMA, UFMG, UFMT, UFNT, UFOB, UFPB, UFPE, UFPI, UFPR, UFR, UFRA, UFRR, UFRRJ, UFSB, Ufscar, UFT, UFTM, UFV, UFVJM, UnB, Unifal-MG, Unifap, Unifei, Unifesp, Unifesspa, Unila, Unilab, Unipampa, Unir, Unirio, Univasf, and UTFPR.

70. Finally, the analysis pointed out that in 59 federal universities, there is no specific training for investigation teams to conduct administrative processes involving harassment cases. The higher education institutions in this condition are: Furg, UFABC, UFAC, Ufal, UFAM, UFAPE, UFBA, UFC, UFCA, UFCat, UFCG, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFGD, UFJ, UFJF, UFLA, UFMA, UFMG, UFMT, UFOB, UFPA, UFPB, UFPE, UFPel, UFPI, UFPR, UFR, UFRA, UFRB, UFRJ, UFRPE, UFRR, UFRRJ, UFS, UFSB, UFSC, UFSJ, UFSM, UFT, UFTM, UFU, UFV, UFVJM, UnB, Unifal-MG, Unifap, Unifei, Unifesp, Unifesspa, Unila, Unilab, Unipampa, Univasf, and UTFPR.

71. Focus groups with students at the federal universities UFAC, UFAM, UFMA, UFMG, UFPE, UFSC, and UnB highlighted weaknesses in the process of dissemination and education on the theme of harassment, as indicated in the on-site visit extracts of these institutions.

72. Focus groups with faculty and technical-administrative staff at the federal universities UnB, UFAM, UFOP, and UFPE highlighted limitations in the training of investigation teams for harassment cases.

73. Given the absence of a response to the audit request, UFCG and Ufopa did not prove that they promote the electronic dissemination of links and pages accessing relevant harassment legislation and/or the instituted policy and/or adopted protocols and that they develop a training program on the theme of harassment.

74. Law 14.540/2023, which instituted the Program for the Prevention and Confrontation of Sexual Harassment and other Crimes against Sexual Dignity and Sexual Violence within the public administration, direct and indirect, federal, state, district, and municipal, provides in its art. 4 the need for training public agents and implementing educational campaigns on the behaviors and conduct that characterize sexual harassment.

75. The aforementioned law also stipulates, in its art. 5, items IV and V, the development of actions and strategies that promote the dissemination of accessible channels for reporting harassment, as well as relevant legislation and public policies for protection, reception, assistance, and guaranteeing rights to individuals in situations of harassment.

76. Furthermore, as provided in art. 5, items II and VII, of Law 14.540/2023, there is also a need to provide educational and informational materials and create training programs on the theme of harassment, with minimum content indicated in the referred regulation.

77. Corroborating the rules described above, Decree 12.122/2024, which instituted the Federal Program for the Prevention and Confrontation of Harassment and Discrimination within the federal public administration, which also covers moral harassment, establishes in its art. 2, item I, and art. 7, item I, educational and training actions to be carried out within the scope of the Federal Program for the Prevention and Confrontation of Harassment and Discrimination.

78. As **possible causes** for the situation found, the recent promulgation of Law 14.540/2023 and Decree 12.122/2024, approved in 2023 and 2024, respectively, which began to require actions and strategies for preventing and combating harassment within the Federal Public Administration, is cited.

79. Furthermore, with the entry into force of Law 14.540/2023 and Decree 12.122/2024, some harassment prevention and combat policies developed before the regulations needed to be adapted to the new legislation.

80. Another relevant fact is the strike movement that occurred in the first half of 2024, lasting sixty-nine days.

81. Additionally, federal universities that do not yet have an institutional policy do not have internal regulations to be disseminated electronically, and have not yet reached a level of maturity for creating institutional training programs on the theme of harassment.

82. The **possible effects of the absence of dissemination of the harassment prevention and combat policy and/or applicable legislation and/or adopted protocols on an official electronic page** are the reduction of the academic community's capacity to be informed about their rights and duties, as well as the ways to claim their prerogatives concerning harassment cases in the university environment. This lack of information fosters the occurrence of harassment cases in the university environment without the corresponding reporting and investigation of the facts, thus resulting in the ineffectiveness of the harassment prevention and combat policy.

83. Regarding the **effects of the lack of specific training on the performance of harassment case investigation committees**, limitations in the technical capacity of the investigation teams are identified, which can lead to inadequate handling of the investigation process, for example, by not considering the gender perspective (which consists of an approach that pays attention to existing gender inequalities and aims to neutralize them, seeking to achieve substantive equality) and by incurring in revictimization.

84. Given the above, regarding the federal universities indicated in finding III.1 (Appendix C), which do not have an institutionalized harassment prevention and combat policy, the recommendation proposal was consolidated in Finding III.1, also covering the points listed in Finding III.3.

85. Regarding the other universities, which have established policies, it is **proposed to recommend**, as described, by university, in Appendix D:

a) To Furg, UFABC, Ufal, UFCG, UFDPAr, UFGD, UFJ, UFJF, UFLA, UFOB, UFPA, UFR, UFRR, UFSCar, UFSM, UFU, UFV, UFVJM, UnB, Unifei, and Unir to develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols/flows; and training for the investigation teams of harassment cases, with a gender perspective, based on art. 5, item VII, of Law 14.540/2023 and art. 7, item I, of Decree 12.122/2024;

b) To UFABC, Ufal, UFCG, UFDPAr, UFGD, UFJ, UFJF, UFOB, UFR, UFRB, UFRN, UFRR, Ufscar, UFSM, UFU, UFV, UFVJM, Unifei, and Unir to promote the dissemination of accessible channels for reporting harassment, as well as to publish the relevant legislation on the university's institutional web page, in accordance with art. 5, items IV and V, of Law 14.540/2023;

c) To UFG, UFRGS, UnB, and Unipampa to promote the inclusion of a link on the institution's homepage about the policy for preventing and combating harassment, with the dissemination of the reception, guidance, reporting, and investigation protocols/flows for harassment cases, in compliance with art. 5, items IV and V, of Law 14.540/2023; and

86. It is **expected that with the implementation of the deliberation**, the number of federal universities that disseminate their harassment prevention and combat policies and/or applicable legislation and/or adopted protocols on their institutional web pages will increase from 17 to 69, and the number of federal universities with an institutional training and education program on the theme of harassment will increase from 19 to 69.

87. The proposal contributes to raising awareness within the university community about abusive harassment behaviors. Additionally, it contributes to the dissemination of knowledge about harassment within the university community, promoting the effectiveness of actions to prevent and combat abusive behaviors.

III.4 Gaps in the definition, structuring, and integration of internal units responsible for reporting channels and protocols for welcoming, listening to, supporting, and guiding individuals affected by harassment situations.

88. From the analyses conducted in the 69 federal universities, the following situations were observed: i) absence of evidence of the definition of internal structures and protocols for welcoming harassed individuals; ii) lack of integration of the reception and guidance structures in harassment cases; iii) absence of protocols/flowcharts aimed at avoiding risks of revictimization and/or retaliation against complainants in harassment situations.

89. In 50 federal universities, listed in the consolidation of individual analyses (document 987), there was no evidence of the definition of internal structures and protocols for welcoming harassed individuals, or there are limitations regarding the reception of members of the university community, such as outsourced workers, in non-compliance with the provisions of Law 14.540/2023 (art. 4, item II, and art. 5, §§1 and 2), Law 14.457/2022 (art. 23, item II), Decree 12.122/2024 (art. 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (arts. 7 to 14).

90. Regarding the gaps in the absence of the definition of internal structures and protocols for welcoming and guiding individuals in harassment situations, the situation was evidenced in the following institutions (document 987): UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFJ, UFLA, UFMA, UFMG, UFMT, UFNT, UFOB, UFPA, UFPE, UFPel, UFPI, UFPR, UFR, UFRA, UFRGS, UFRPE, UFRR, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFT, UFTM, UFU, Unifal-MG, Unifap, Unifesp, Unifesspa, Unila, Unilab, Unirio, Univasf, and UTFPR.

91. In 46 federal universities, listed in the consolidation of individual analyses (document 987), there is no integration of reception and guidance structures in harassment cases, contrary to the provisions of Law 14.540/2023 (art. 5, item VI), Law 14.457/2023 (art. 23, item II), and Decree 12.122/2024 (art. 7).

92. The lack of integration of reception and guidance structures in harassment cases was evidenced in the following federal universities: UFABC, UFAC, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFSCPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFGD, UFMA, UFMG, UFMT, UFNT, UFOB, UFOP, UFPA, UFPE, Ufpel, UFPI, UFPR, UFR, UFRA, UFRJ, UFRPE, UFRR, UFS, UFSCar, UFSJ, UFSM, UFT, UFU, Unifal-MG, Unifap, Unifesp, Unifesspa, Unila, Unilab, Unirio, Univasf, and UTFPR.

93. Additionally, in 51 federal universities, there is no protocol/flowchart aimed at avoiding risks of revictimization and/or retaliation against complainants in harassment situations. This situation was evidenced in the following federal universities: Furg, UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFGD, UFJ, UFLA, UFMA, UFMG, UFMT, UFNT, UFOB, UFPA, UFPE, UFPel, UFPI, UFPR, UFR, UFRA, UFRGS, UFRPE, UFRR, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFT, UFTM, UFU, Unifap, Unifesp, Unifesspa, Unila, Unilab, Unirio, Univasf, and UTFPR.

94. Despite not having a defined protocol for welcoming individuals in harassment situations, the following federal universities indicated elements of integration of internal units: Furg, Ufal, UFJ, UFLA, and UFRGS.

95. The federal universities UFG, UFJF, UFMS, UFPB, UFRB, UFRN, UFVJM, UnB, and Unir have regulations aimed at integrating internal units in preventing and combating harassment.

96. In 14 federal universities, it was not possible to evaluate the existence of a protocol/flowchart to avoid risks of revictimization due to limited/absent information provided: UFCG, Ufopa, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFSM, UFV, UnB, Unifal-MG, Unifei, and Unipampa.

97. Ufopa and UFCG did not send information, and the provisions on the institutions' websites do not allow for a conclusive analysis regarding the protocols and structures for welcoming, guiding, and forwarding harassment complaints.

98. Only in the following 8 (eight) federal universities is there a defined protocol for welcoming and guiding individuals in harassment situations, with integration of the structures for forwarding complaints and investigating cases and guidelines for mitigating the risks of revictimization: UFG, UFJF, UFMS, UFPB, UFRB, UFRN, UFVJM, and Unir.

99. In the case of UFOP, there is a defined protocol/flowchart for welcoming and guiding individuals in harassment situations, with actions aimed at mitigating the risks of revictimization. However, there is no integration of the reception and forwarding structures with the investigation instances (especially with the institution's Internal Affairs). The institution proved that a proposal to amend the resolution on the issue was developed (document 1132), with no need for additional measures.

100. Art. 5, item VI, of Law 14.540/2023 provides for the establishment of procedures for forwarding complaints and reports of sexual harassment and other crimes against sexual dignity, or any form of sexual violence, ensuring confidentiality and due process.

101. Decree 12.122/2024 provides in its art. 2, items IV and VII, the need to allocate spaces and create mechanisms to promote reception, active listening, guidance, and support for individuals affected by harassment and discrimination, as well as the establishment of disciplinary administrative procedures that protect the victim at all stages, to avoid revictimization.

102. In federal universities where there is no institutionalized policy (or sectoral plan) for preventing and combating harassment, the definition of reception and guidance spaces in harassment cases should be promoted along with the approval of the referred policy, based on the internal analysis of existing structures that can be included from a perspective of welcoming individuals in harassment situations.

103. In this regard, concerning the 41 federal universities described in finding III.1, the proposed action was consolidated in the referred audit finding.

104. It is worth noting that the absence of a defined regulation of structures and protocols for welcoming and guiding individuals in harassment situations does not mean the non-existence, within federal universities, of structures and units that can promote reception and guidance actions. However, the fact that it is not properly regulated within the harassment prevention and combat policy goes against the guidelines of Decree 12.122/2024 (art. 2, items IV and VII), which provides for the allocation of spaces and the creation of mechanisms to promote reception, active listening, guidance, and support for individuals affected by harassment and administrative procedures that protect the victim to avoid revictimization.

105. CNJ Resolution 351/2020, in its annex II, provides guidance on reception protocols in harassment situations. It does not mean, based on the reference standard, that the mere availability of a reporting channel through the Ombudsman (with records in Fala.BR) constitutes a reception and

guidance protocol for individuals in harassment situations, as stated in the responses of 50 federal universities, where there is no explicit definition of reception structures and protocols.

106. Regarding the **possible causes for the existence of gaps in the definition, structuring, and integration of internal units** responsible for reporting channels and protocols for welcoming, listening, supporting, and guiding individuals affected by harassment situations, it is worth highlighting, as already indicated in this report, that the specific legislation on the actions of federal public institutions in harassment cases, with requirements for structuring and defining reporting channels and protocols for welcoming and guiding individuals in harassment situations, is recent, promulgated in 2023 and 2024 (Law 14.540/2023; Decree 12.122/2024).

107. Especially in federal universities that do not yet have an institutional policy, with the definition of a set of actions and strategies aimed at preventing and combating harassment cases, there has not yet been a definition of protocols and the responsibilities of reception and guidance structures regarding the forwarding of complaints and aspects related to the integration of internal instances in preventing and combating harassment.

108. Furthermore, collective debates within universities, including for defining internal protocols and structuring units for reception and guidance in harassment cases, require time and maturity.

109. Personnel limitations within federal universities can impact the definition and structuring of internal spaces for reception and guidance of individuals in harassment situations.

110. Regarding the **probable effects of the absence of definition and structuring of internal instances for welcoming and guiding individuals in harassment situations**, the situation impacts the effectiveness of actions to prevent and combat this problem, limits the number of complaints, and hinders the promotion of a healthy, safe work environment that favors the inclusion and coexistence of women and other individuals vulnerable to the risks of abusive behaviors of moral or sexual harassment and other forms of gender violence.

111. Additionally, weaknesses in the functioning of reporting and guidance channels for individuals in harassment situations can limit the effectiveness of investigating harassment cases.

112. Regarding the federal universities indicated in finding III.1 (Appendix C), which do not have an institutionalized policy for preventing and combating harassment, the recommendation proposal for structuring internal instances for welcoming and guiding specific harassment cases and developing a flowchart/protocol for welcoming and guiding complaints, with dissemination to the university community, was consolidated in the recommendation of Finding III.1.

113. Considering the described situation, it is **proposed to recommend** to the federal universities UFABC, UFDF, UFPA, UFR, Ufscar, and UFV that:

a) Promote the definition and structuring of internal instances for welcoming, guiding, and forwarding complaints of specific harassment cases, with integration of internal units, in accordance with Law 14.540/2023 (art. 4, item II, and art. 5, §§1 and 2), Law 14.457/2022 (art. 23, item II), Decree 12.122/2024 (art. 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (arts. 7 to 14); and

b) Promote the definition of protocols aimed at avoiding revictimization, through the development of a flowchart/protocol for welcoming and guiding complaints, with dissemination to the university community, in accordance with Law 14.540/2023 (art. 5, items III and VI), Decree 12.122/2024 (art. 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II).

114. Regarding the federal universities Furg, UFJ, UFLA, UFGD, UFOB, UFRGS, and UFU, it is **proposed to recommend** that they promote the definition of protocols aimed at avoiding

revictimization, through the development of a flowchart/protocol for welcoming and guiding complaints, with dissemination to the university community, in accordance with Law 14.540/2023 (art. 5, items III and VI), Decree 12.122/2024 (art. 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II).

115. It is **proposed to recommend** to UFRR that it conclude the process of defining the structuring of internal instances for attending and welcoming specific harassment cases, and promote the development of a flowchart for welcoming and guiding complaints, with dissemination to the university community, in accordance with Law 14.540/2023 (art. 4, item II, and art. 5, §§1 and 2), Law 14.457/2022 (art. 23, item II), and Decree 12.122/2024 (art. 2, items II and IV).

116. It is **proposed to recommend** to UFSM that it take measures to structure internal instances for attending and welcoming specific harassment cases, especially regarding the flow of forwarding complaints and conducting the investigation processes of harassment cases, with dissemination to the university community, in accordance with Law 14.540/2023 (art. 4, item II, and art. 5, §§1 and 2), Law 14.457/2022 (art. 23, item II), and Decree 12.122/2024 (art. 2, items II and IV).

117. It is **expected that the proposed recommendations**, aimed at promoting the definition, structuring, and functioning of reporting channels and protocols for welcoming, listening to, supporting, and guiding individuals affected by harassment situations, can qualify the complaints with more consistent and robust reports, mitigate the effects on the health of the university community, reduce the impacts on the dropout rates of students in harassment situations, and mitigate the negative effects on the health of harassed employees.

III.5 Absence of specific guidelines/protocols for investigating harassment cases and/or conducting/judging with a gender perspective.

118. **From the analyses conducted in the 69 federal universities, the following situations were observed: i) there is no definition of specific protocols or guidelines for conducting the investigation processes of harassment cases; ii) there was no indication that the processes involving harassment are conducted with a gender perspective.**

119. Out of the 69 federal universities, 55 do not have defined protocols or specific guidelines for conducting the investigation processes of harassment cases. The 55 universities that fall into this situation are: Furg, UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFGD, UFLA, UFMA, UFMG, UFNT, UFOB, UFPA, UFPE, UFPel, UFPI, UFPR, UFR, UFRA, UFRGS, UFRJ, UFRN, UFRPE, UFRR, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFSM, UFT, UFTM, UFU, Unifal-MG, Unifap, Unifei, Unifesp, Unifesspa, UNILA, Unilab, Unipampa, Unirio, Univasf, and UTFPR.

120. In 10 universities, there are defined protocols or specific guidelines for conducting the investigation processes involving harassment cases. The universities that make up this list are: UFG, UFJ, UFJF, UFMS, UFOP, UFPB, UFRB, UFV, UFVJM, and Unir.

121. At the universities: UFCG, UFMT, Ufopa, and UnB, it was not possible to evaluate whether there are defined protocols or specific guidelines for conducting the investigation processes of harassment cases due to the limitations of the information provided or the absence of responses.

122. Out of the 69 federal universities, 52 did not indicate that the processes involving harassment are conducted with a gender perspective. The 52 universities that fall into this situation are: Furg, UFABC, UFAC, Ufal, UFAM, Ufape, UFBA, UFC, UFCA, UFCat, UFCSPA, UFDPAr, Ufersa, UFES, UFF, UFFS, UFGD, UFJ, UFLA, UFMA, UFNT, UFOB, UFPA, UFPB, UFPE, UFPel, UFPI, UFPR, UFRA, UFRB, UFRJ, UFRN, UFSB, UFSJ, UFSM, UFT, UFTM, UFU, UFV,

UFVJM, Unifal-MG, Unifap, Unifei, Unifesp, Unifesspa, Unila, Unilab, Unipampa, Unir, Unirio, Univasf, and UTFPR.

123. In 6 universities, there is an indication that a gender perspective is adopted in the administrative processes involving harassment cases. The universities that fall into this situation are: UFG, UFJF, UFMS, Ufop, UFRGS, and UFSC.

124. It was not possible to evaluate this aspect in 10 universities due to the limitations of the information provided or the absence of responses.

125. The causes for the absence of defined protocols or specific guidelines for conducting the investigation processes of harassment cases could not be identified due to the limitations of the audit procedures used. However, three factors stand out as possible causes:

a) Law 14.540/2023 and Decree 12.122/2024, which began to require actions and strategies to combat harassment within the Federal Public Administration, are recent, from 2023 and 2024;

b) In 2024, there was a strike movement in federal universities that lasted sixty-nine days;

c) Decisions in collegiate bodies in federal universities require a maturation time to expand the collective debate.

126. In conducting processes with a gender perspective, there is a need to recognize the procedural insufficiency affecting the female gender due to prejudices that place women in a position of social inequality. **In this sense, the composition of teams without gender equity in processes involving harassment cases, especially when the woman is in the position of the harassed person, can reinforce gender inequalities and impact aspects related to evidence collection and generate risks of revictimization.** Technical Note 1869/2024 from the Office of the Comptroller General, prepared with reference to CNJ Resolution 492/2023, provides guidelines on conducting processes with a gender perspective.

127. Art. 2 of Decree 12.122/2024 states that the purpose of the Federal Program for the Prevention and Confrontation of Harassment and Discrimination is to address all forms of violence arising from work relationships, especially moral and sexual harassment and discrimination. Thus, it provides for the guarantee of disciplinary administrative procedures that protect the person in a harassment situation at all stages, aiming to avoid revictimization and protect against retaliatory actions against complainants.

128. Art. 5, item VI of Law 14.540/2023 lists as a guideline of the Program for the Prevention and Confrontation of Sexual Harassment and other Crimes against Sexual Dignity and Sexual Violence the establishment of procedures for forwarding complaints and reports, ensuring confidentiality and due process.

129. **The effect of the described situation** is that the absence of defined protocols or specific guidelines for conducting the investigation processes of harassment cases **can result in a generic approach** to situations that require a specific set of precautions during the handling of cases, such as the way information is collected, testimonies are taken, and the treatment of those involved in harassment cases.

130. Additionally, there is a **risk of revictimization** of the person in a harassment situation, due to processes that do not consider the particularities of harassment cases, potentially devaluing the reports and subjecting the victim to constraints, such as being heard in the presence of the aggressor.

131. The absence of specific guidelines/protocols for investigating harassment cases and/or conducting/judging with a gender perspective can **contribute to the ineffectiveness of case investigations**, with the process following general rules without considering gender equity aspects.

132. Given the above, it is **proposed to recommend** to the universities: Furg, UFABC, Ufal, UFCG, UFDPAr, UFGD, UFJ, UFLA, UFOB, UFPA, UFR, UFRB, UFRN, UFRR, Ufscar, UFSM, UFU, UFV, UFVJM, Unifei, Unipampa, UnB, and Unir to take measures to ensure that the investigation and accountability teams/committees are composed and conduct and judge processes involving harassment with a gender perspective, according to the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023.

133. For the 41 institutions that do not have an institutionalized policy for preventing and combating harassment, described in finding III.1, the proposed action was consolidated in the referred audit finding.

134. **It is expected that with the implementation of the deliberation**, the specific protocols or guidelines for conducting the investigation processes of harassment cases will result in the production of results substantially more aligned with the substantive equality provision in the Federal Constitution and the international treaties to which Brazil is a party in Human Rights matters (CNJ, 2021).

135. Additionally, the composition of teams with a gender perspective in processes involving harassment cases, especially when the person in a harassment situation is a woman and/or an LGBTQIAPN+ individual, strengthens aspects related to evidence collection and mitigates the risks of revictimization.

136. Quantitatively, it is expected to increase from 10 to 69 the number of federal universities with investigation protocols and processes involving harassment and from 7 to 69 federal universities with the adoption of specific investigation protocols for harassment cases, including guidelines for conducting processes with a gender perspective.

IV. BEST PRACTICES

137. Regarding **best practices**, some initiatives aimed at preventing and combating harassment at the institutional level should be mentioned under the following aspects:

- a) Development of institutional diagnostics and/or evidence-based actions;
- b) Existence of training/education programs; and
- c) Actions for welcoming and guiding individuals in situations of harassment.

138. Regarding the **development of institutional diagnostics** and **evidence-based actions**, it was found that UFPI and UFRN, before institutionalizing a policy for the prevention and combat of harassment, developed diagnostics on the theme of harassment/gender violence within the university community.

139. UFRGS (specifically for staff) and UFOP (in conducting training/education actions for the university community) **use data on complaints to develop prevention and training actions on harassment**.

140. Regarding training, dissemination, and guidance actions on the theme of harassment, the existence of a **permanent training program at UFOP** (with the extension project “Ouvidoria Feminina”) and at **UFRGS** (with the extension project “Ampare”) stands out. Additionally, the development of **booklets and guidance manuals** on the theme of harassment at UFAC, UFSC, and UFOP is noteworthy.

141. At UFOP, **the processes of training, dissemination, and promotion of campaigns** on the theme of harassment are conducted by the Extension Project “Ouvidoria Feminina,” in collaboration with various women’s movements within the institution. The training processes involve teachers, technical-administrative staff, and students participating in the extension project. Furthermore, in workshops promoted for the university community on harassment, there is guidance

on examples of harassing behaviors and general guidelines and protocols for handling and forwarding complaints (documents 960 and 961).

142. The University of Brasília (UnB) established a **Human Rights Secretariat (SDH)** to promote permanent and multidimensional programs and actions to combat various forms of violence and to foster respectful, ethical, and peaceful coexistence within the institution.

143. Regarding prevention, combining welcoming and guidance actions, it is noteworthy that the Federal University of Goiás (UFG) has a **Permanent Commission for the Prevention and Combat of Moral Harassment, Sexual Harassment, Sexual Harassment, and Discrimination**. This commission serves as a basic welcoming space, providing guidance and developing educational campaigns and actions on the theme of harassment.

144. At UFG, the institutionalization of an Inclusion Secretariat (SIN), linked to the rector's office, includes the **Directorate of Women and Diversity (DMD)**. This directorate aims to contribute to the construction of a more equitable university environment, committed to overcoming gender inequalities, sexual orientations, identities, and bodily expressions that mark differences, thus strengthening the fight for a plural and inclusive institution.

145. Regarding welcoming and guidance actions for individuals in situations of harassment, the **extension project “Ouvidoria Feminina”** at the Federal University of Ouro Preto (UFOP) stands out. The “Ouvidoria Feminina” project is an institutional space for welcoming and receiving reports of violence against women at UFOP and in the community. It integrates the institution with other external bodies combating gender violence, such as specialized women's police stations, the public defender's office, and the municipal government of Ouro Preto. Additionally, through this extension project, UFOP has **partnered with a private higher education institution to offer welcoming and psychosocial support services to individuals experiencing gender violence, including harassment cases**.

146. Regarding the existence of welcoming and guidance spaces for individuals in situations of harassment, there are initiatives for qualified listening and guidance for women and diverse individuals (LGBTQIAPN+), through women's ombudsman offices and/or specific committees/welcoming centers at the Federal University of Juiz de Fora (UFJF), the Federal University of Mato Grosso do Sul (UFMS), the Federal University of Rio de Janeiro (UFRJ), the Federal University of Rio Grande do Norte (UFRN), the Federal University of Santa Catarina (UFSC), the Federal University of the Jequitinhonha and Mucuri Valleys (UFVJM), and the Federal University of Uberlândia (UFU).

147. At UFSC, there is a **Coordination of Sexual Diversity and Gender Violence Prevention (CDGEN)**, which develops training, welcoming, and guidance actions for the university community on gender violence.

148. UFRN established a **Support Center for Individuals in Situations of Violence**, aimed at developing measures, diagnostics, studies, and research on issues related to harassment.

149. UFG, through the Dean of Student Affairs (Prae), has the “Saudavelmente” program, which constitutes a mental health care service for students. This program is integrated into the policy of prevention and combat of harassment, especially by providing psychological support to individuals in situations of harassment.

150. The Federal University of Grande Dourados (UFGD) institutionalized the Women's and Diversity Ombudsman, which is a structured service to address gender and diversity-related demands. Additionally, it developed a Protocol for Attending Women Victims of Violence at UFGD, which can be adapted to other cases as provided in the resolution that established the university's policy.

151. Although not solely linked to welcoming in harassment cases, it is worth highlighting the **existence of a Student Health Care Center (Nase)** at the Federal University of Pernambuco (UFPE), linked to the Dean of Student Affairs (Proaes). This center develops actions and activities related to psychological support, testing and counseling for sexually transmitted infections, seasonal health promotion campaigns and vaccinations, group training for social skills improvement, and support for women in situations of violence (<https://www.ufpe.br/proaes/nase>).

152. Regarding training on the investigation of harassment cases, particularly **guidelines for conducting processes with a gender perspective**, it is noteworthy that the Federal University of Mato Grosso do Sul (UFMS) has a page for disseminating opinions, booklets, and guidelines from the Attorney General's Office and the Office of the Comptroller General. This page also includes thematic studies on harassment, videos with guidelines on the actions of the ombudsman and the internal affairs office, and a link to the institutional policy for the prevention of harassment.

V. CONCLUSION

153. This audit aimed to evaluate the existence and potential outcomes of systems and practices for the prevention and combat of harassment in federal universities, considering relevant norms and best practices.

154. Regarding the institutionalization of actions and strategies related to the prevention and combat of harassment, it was found that out of a total of 69 federal universities, **41 still do not have an institutionalized policy or sectoral plan for the prevention and combat of abusive harassment behaviors**, contrary to the normative guidelines of Law 14,540/2023, Law 14,457/2022, Decree 12,122/2024, and Decision 456/2022-TCU/Plenary (Rapporteur Walton Alencar Rodrigues) (finding III.1).

155. Given the absence of an institutionalized policy for the prevention and combat of harassment, there is a need to define and structure internal instances for the reception, guidance, and referral of harassment complaints, as well as to define flowcharts/protocols for complaints and investigation processes. There is also a need for dissemination and the establishment of a training program, in accordance with the guidelines of Law 14,540/2023 and Decree 12,122/2024.

156. Among the 28 federal universities with an institutionalized policy for the prevention and combat of harassment, 19 institutions have gaps concerning the normative provisions on the subject. These gaps include not covering all members of the university community (especially outsourced workers), lack of participation of university community members in the process of drafting and approving the prevention policy, absence of defined protocols/flowcharts and structures related to the prevention and combat of harassment, or lack of integration between internal units (finding III.2).

157. Additionally, weaknesses were identified in the dissemination of actions and strategies for the prevention and combat of harassment, the applicable legislation, and/or the adopted protocols on the institutional websites of federal universities. Regarding training actions, **in 50 federal universities, there is no institutional training and capacity-building program on the topic of harassment**. There are also weaknesses in specific training for conducting administrative processes involving harassment (training of investigation teams) (finding III.3).

158. In 51 federal universities, there was no evidence of the definition of internal structures and protocols/flowcharts for the reception and guidance of individuals in situations of harassment, or there are limitations regarding the reception of members of the university community, such as outsourced workers. Additionally, in 46 federal universities, there is no integration of reception and

guidance structures in harassment cases, and there is no protocol/flowchart aimed at avoiding risks of re-victimization and/or retaliation against complainants in situations of harassment (finding III.4).

159. Among the 69 federal universities, **55 do not have defined protocols or specific guidelines for conducting the investigation processes of harassment cases**. In 52 federal universities, there is no indication that processes involving harassment are conducted with a gender perspective (finding III.5).

160. Considering the identified improprieties/irregularities in the analysis, the main proposals for measures involve recommendations to federal universities to:

a) adopt measures for the institutionalization of a policy for the prevention and combat of harassment; promote adjustments in institutionalized policies where there are gaps in relation to the legislation;

b) develop and implement a training program on sexual and moral harassment, with updated courses that include: training on the reception, guidance, and reporting flows/protocols; and training for the teams responsible for investigating harassment cases, with a gender perspective;

c) promote the dissemination of accessible channels for reporting harassment practices, as well as publish the relevant legislation on the university's institutional website;

d) promote the definition of the structuring of internal instances for the reception, guidance, and forwarding of specific harassment case reports, with the integration of internal units;

e) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community; and

f) adopt measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective

161. Concerning UFCG, which did not respond to the audit request and there was no comment from the managers, it is proposed to inform that the failure to comply with the diligence within the stipulated period and without justified cause, and the withholding of documents or information during inspections or audits conducted by the Court, violates the provisions of Article 58, items IV and VI, of Law 8.443/1992 (Organic Law of the Federal Court of Accounts).

162. Regarding **best practices**, several initiatives aimed at the prevention and combat of harassment at the institutional level were identified, under the following aspects: the development of institutional diagnostics and/or evidence-based actions (UFOP; UFRN, UFPI); the existence of training programs (UFRGS; UFG; UFOP); and actions for the reception and guidance of individuals in situations of harassment (UFG; UFGD, UFJF; UFMS; UFOP; UFRJ, UFRN; UFVJM, UFU), as described in item IV of this report.

163. Considering the reference standards and best practices, the debate on the prevention and combat of harassment in federal universities can contribute to encouraging institutions that have not yet started the process of institutionalizing this type of equity policy to advance in the construction of normative instruments on the subject, with the participation of the university community, in addition to enabling updates and improvements in the actions of institutions that already have institutionalized/implemented policies on harassment.

164. Finally, it is proposed to forward a copy of the decision to be issued to the Ministry of Education (MEC), the Senate Education Committee, the Education, Culture, and Sports Committee

of the House of Representatives, and the Ministry of Management and Innovation in Public Services (MGI).

VI. PROPOSAL OF MEASURES

165. Considering the above-mentioned analysis, this report is submitted for superior consideration with the following proposals:

166. **Recommend**, based on Article 11 of TCU Resolution 315/2020, that:

The institutions Federal University of Acre (UFAC), Federal University of Amazonas (UFAM), Federal University of Agreste of Pernambuco (Ufape), Federal University of Bahia (UFBA), Federal University of Ceará (UFC), Federal University of Cariri (UFCA), Federal University of Catalão (UFCat), Federal University of Health Sciences of Porto Alegre (UFCSPA), Federal University of the Semi-Arid Region (Ufersa), Federal University of Espírito Santo (UFES), Fluminense Federal University (UFF), Federal University of Southern Frontier (UFFS), Federal University of Maranhão (UFMA), Federal University of Minas Gerais (UFMG), Federal University of Mato Grosso (UFMT), Federal University of Northern Tocantins (UFNT), Federal University of Paraíba (UFPB), Federal University of Pernambuco (UFPE), Federal University of Pelotas (Ufpel), Federal University of Piauí (UFPI), Federal University of Paraná (UFPR), Federal Rural University of Amazonia (UFRA), Federal University of Rio de Janeiro (UFRJ), Federal Rural University of Pernambuco (UFRPE), Federal Rural University of Rio de Janeiro (UFRRJ), Federal University of Sergipe (UFS), Federal University of Southern Bahia (UFSB), Federal University of Santa Catarina (UFSC), Federal University of São João del-Rei (UFSJ), Federal University of Tocantins (UFT), Federal University of the Triângulo Mineiro (UFTM), Federal University of Alfenas in Minas Gerais (Unifal-MG), Federal University of Amapá (Unifap), Federal University of São Paulo (Unifesp), Federal University of Western Pará (Ufopa), Federal University of Southern and Southeastern Pará (Unifesspa), Federal University for Latin American Integration (Unila), Federal University for International Integration of the Afro-Brazilian Lusophony (Unilab), Federal University of the State of Rio de Janeiro (Unirio), Federal University of the São Francisco Valley (Univasf), and Federal Technological University of Paraná (UTFPR):

166.1 adopt measures for the institutionalization of a policy (or sectoral plan, as per the nomenclature of Decree 12.122/2024) for the prevention and combat of harassment, with the involvement and participation of the university community, aiming at the definition of conduct, the development of flowcharts/protocols for reception, guidance, complaints, and investigation/accountability of harassment cases, with the definition of competencies of internal units related to the topic and guidance on procedural conduct with a gender perspective, as well as establish a training and education program on harassment, with wide dissemination within the institution, in accordance with the normative provisions of Law 14.540/2023, Law 14.457/2022, Decree 12.122/2024, TCU Decision 456/2022-Plenary (Rapporteur Walton Alencar Rodrigues), CNJ Resolutions 351/2020 and 492/2023, the Lilac Guide, and Technical Note 1869/2024/CGUNE/DICOR/CRG (Office of the Comptroller General).

The institutions Federal University of Western Bahia (UFOB), Federal University of Pará (UFPA), Federal University of Rio Grande do Sul (UFRGS), Federal University of Santa Maria (UFSM), Federal University of Uberlândia (UFU), and Federal University of Pampa Foundation (Unipampa):

166.2 adopt measures to review the actions and strategies for the prevention and combat of harassment to ensure their reach to the entire university community, in accordance with Article 3, §1 and Article 5, item I, of Decree 12.122/2024; Article 5, item I, of CNJ Resolution 351/2020;

The institutions Federal University of Alagoas (Ufal), Federal University of Jequitinhonha and Mucuri Valleys (UFVJM), and Federal University of Pampa Foundation (Unipampa):

166.3 adopt measures that promote the participation of the entire university community in the processes of monitoring and overseeing the policy (or sectoral plan, considering the nomenclature of Decree 12.122/2024), in accordance with Article 4 and Article 5, item I, of Decree 12.122/2024;

The institutions Federal University of Jequitinhonha and Mucuri Valleys (UFVJM):

166.4 adopt measures for the institutionalization of actions and strategies for the prevention and combat of moral harassment, with the involvement and participation of the university community, in accordance with the guidelines of Decree 12.122/2024;

The institutions Federal University of Rio Grande (Furg), Federal University of ABC Foundation (UFABC), Federal University of Alagoas (Ufal), Federal University of Campina Grande (UFCG), Federal University of Delta of Parnaíba (UFDPAr), Federal University of Grande Dourados Foundation (UFGD), Federal University of Jataí (UFJ), Federal University of Itajubá (Unifei), Federal University of Juiz de Fora (UFJF), Federal University of Lavras (UFLA), Federal University of Western Bahia (UFOB), Federal University of Pará (UFPA), Federal University of Rondonópolis (UFR), Federal University of Roraima (UFRR), Federal University of São Carlos (Ufscar), Federal University of Santa Maria (UFSM), Federal University of Uberlândia (UFU), Federal University of Viçosa (UFV), Federal University of Jequitinhonha and Mucuri Valleys (UFVJM), University of Brasília (UnB), Federal University of Rondônia Foundation (Unir):

166.5 develop and implement a training program on sexual and moral harassment, with updated courses, training on the reception, guidance, and reporting protocols, and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024;

The institutions Federal University of ABC (UFABC), Federal University of Alagoas (Ufal), Federal University of Campina Grande (UFCG), Federal University of Delta of Parnaíba (UFDPAr), Federal University of Goiás (UFG), Federal University of Grande Dourados Foundation (UFGD), Federal University of Itajubá (Unifei), Federal University of Jataí (UFJ), Federal University of Juiz de Fora (UFJF), Federal University of Western Bahia (UFOB), Federal University of Rondonópolis (UFR), Federal University of Recôncavo da Bahia (UFRB), Federal University of Rio Grande do Norte (UFRN), Federal University of Rio Grande do Sul (UFRGS), Federal University of Roraima (UFRR), Federal University of Santa Maria (UFSM), Federal University of Uberlândia (UFU), Federal University of São Carlos (Ufscar), Federal University of Viçosa (UFV), Federal University of Jequitinhonha and Mucuri Valleys (UFVJM), University of Brasília (UnB), Federal University of Rondônia (Unir), Federal University of Pampa Foundation (Unipampa):

166.6 promote the dissemination of accessible channels for reporting harassment practices, as well as the pertinent legislation, in accordance with Article 5, items IV and V, of Law 14.540/2023;

The institutions Federal University of ABC Foundation (UFABC), Federal University of Alagoas (Ufal), Federal University of Campina Grande (UFCG), Federal University of Delta of Parnaíba (UFDPAr), Federal University of Goiás (UFG), Federal University of Lavras (UFLA), Federal University of Pará (UFPA), Federal University of Rondonópolis (UFR), Federal University of Rio Grande do Sul (UFRGS), Federal University of Roraima (UFRR), Federal University of São Carlos (Ufscar), Federal University of Uberlândia (UFU), Federal University of Rondônia Foundation (Unir), Federal University of the State of Rio de Janeiro (Unirio):

166.7 promote the definition and structuring of internal instances for the reception, guidance, and forwarding of specific harassment case reports, with the integration of internal units, in accordance with Law 14.540/2023 (Article 4, item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, item II), Decree 12.122/2024 (Article 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14);

The institutions Federal University of Rio Grande (Furg), Federal University of ABC Foundation (UFABC), Federal University of Alagoas (Ufal), Federal University of Campina Grande (UFCG), Federal University of Delta of Parnaíba (UFDPAr), Federal University of Grande Dourados Foundation (UFGD), Federal University of Jataí (UFJ), Federal University of Lavras (UFLA), Federal University of Western Bahia (UFOB), Federal University of Pará (UFPA), Federal University of Rondonópolis (UFR), Federal University of Rio Grande do Sul (UFRGS), Federal University of Roraima (UFRR), Federal University of São Carlos (Ufscar), Federal University of Uberlândia (UFU), Federal University of Rondônia Foundation (Unir), Federal University of the State of Rio de Janeiro (Unirio):

166.8 promote the definition of protocols aimed at avoiding revictimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II);

The institutions Federal University of Rio Grande (Furg), Federal University of ABC Foundation (UFABC), Federal University of Alagoas (Ufal), Federal University of Campina Grande (UFCG), Federal University of Delta of Parnaíba (UFDPAr), Federal University of Grande Dourados Foundation (UFGD), Federal University of Itajubá (Unifei), Federal University of Jataí (UFJ), Federal University of Lavras (UFLA), Federal University of Western Bahia (UFOB), Federal University of Pará (UFPA), Federal Rural University of Rio de Janeiro (UFRRJ), Federal University of Recôncavo da Bahia (UFRB), Federal University of Rio Grande do Norte (UFRN), Federal University of Roraima (UFRR), Federal University of Rondonópolis (UFR), Federal University of São Carlos (Ufscar), Federal University of Santa Maria (UFSM), Federal University of Uberlândia (UFU), Federal University of Viçosa (UFV), Federal University of Jequitinhonha and Mucuri Valleys (UFVJM), Federal University of Pampa Foundation (Unipampa), University of Brasília (UnB), Federal University of Rondônia Foundation (Unir):

166.9 adopt measures to ensure that the investigation and accountability teams/commissions are composed and conduct the handling and judgment of cases involving harassment with a gender perspective, in accordance with the guidelines set forth in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023.

167. Notify, pursuant to Article 9, item I, of TCU Resolution 315/2020, the Federal University of Campina Grande (UFCG) that failure to comply with a diligence within the stipulated period without justified cause, and the withholding of documents or information during inspections or audits conducted by the Court, violates the provisions of Article 58, items IV and VI, of Law 8.443/1992 (Organic Law of the Federal Court of Accounts).

168. Forward a copy of the decision to be issued to the Ministry of Education (MEC), the Senate Education Committee, the Education, Culture, and Sports Committee of the House of Representatives, and the Ministry of Management and Innovation in Public Services (MGI).



TCU/AudEducação, on 10/24/2024.

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Appendix A – Analysis of the audited entities' comments

1. In compliance with the provisions set forth in paragraphs 144 to 148 of the Auditing Standards of the Federal Court of Accounts (NAT), approved by TCU Ordinance 280/2010 and amended by TCU Ordinance 185/2020; in paragraphs 520 to 527 of the TCU Performance Audit Manual, approved by TCU Ordinance 144/2000 and revised by Segecex Ordinance 18/2020; as well as in articles 14 and 15 of TCU Resolution 315/2020, a preliminary version of the individualized analysis report and the findings matrix, along with the proposed measures for comments on relevant points of the said report (documents 987 and 988), was sent to the 69 audited federal universities via the Conecta/TCU System on 10/10/2024.
2. The forwarding of the individualized analysis to the federal universities, along with the respective proposed measures, aimed to provide these educational institutions with the opportunity to comment on the findings, conclusions, and proposed audit deliberations before the final consolidated report is issued (ISSAI 3000/129, 2016). Additionally, the reasons for any changes in the audit report or rejection of the received comments will be analyzed and recorded subsequently (ISSAI 3000/130, 2016).
3. Although the universities were notified of the preliminary analysis and the proposed measures, along with the respective acknowledgments (documents 989-1127), **the following universities did not submit their comments within the stipulated deadline:** UFVJM, Unifal-MG, Unila, UFF, Unipampa, UFJ, UFAC, Ufscar, UFMT, Univasf, UFR, UFSB, Unifap, Unirio, UFES, UFSM, UFMS, UFRN, Unir, UFPB, UFMG, UFRJ, UFPE, UFS, UFRA, UFCG, UFPA, UFNT, UFPI, and UFBA.
4. The comments from the remaining universities audited are presented below, according to the finding and/or proposed measure to which they refer.
5. The Federal University of Itajubá (**Unifei**) submitted proof of the institutionalization of a policy for the prevention and combat of harassment (document 1128), approved on 07/08/2024 by the University Council. **This fact justifies its exclusion from finding III.1 of the preliminary audit report** and reduces the number of federal universities without an institutionalized policy for the prevention and combat of harassment from 42 to 41.
6. Due to the short period since its publication, the aforementioned regulation has not yet been widely disseminated within the institution. This fact justifies the inclusion of a proposal for measures related to finding III.3 for Unifei, which concerns **training and dissemination actions of the institutional policy and the adopted flows/protocols. The recommendation proposed in finding III.5 will also be maintained.**
7. The Federal University of Catalão (UFCat) submitted a response (document 1129) indicating that the policy for the prevention and combat of harassment is under public consultation, not substantially altering the proposal in finding III.1. Despite the indication of institutional campaigns on the subject, it does not constitute a training program that meets the requirements of Law 14.540/2023. Furthermore, there was no explicit definition of structures and protocols for welcoming and guiding individuals in situations of harassment (document 1129, p. 5). Therefore, there are ongoing measures by UFCat, but they are not yet concluded, justifying the maintenance of the initial proposal (finding III.1).
8. The Federal University of Western Bahia (Ufob) reiterated its commitment to comply with the proposed recommendations and established a commission to reformulate the institutional policy for the prevention and combat of harassment (documents 1130-1131), with no need for changes to the preliminary proposal.

9. The Federal University of Ouro Preto (**UFOP**), in comments on the preliminary analysis proposal (document 1132), agreed with the suggested improvements in the regulation of the policy for the prevention and combat of harassment and demonstrated that there is already a proposal to amend the regulations, submitted to the University Council (document 1132, pp. 4-10), aimed at addressing the gaps identified in finding III.2. In this regard, despite the "reservation that its effective implementation depends on the deliberation of the University Council" (document 1132, p. 2), **the institution's management has already taken steps to comply with the proposed recommendation, with no need to maintain it in the final report of this work.**

10. The Federal Technological University of Paraná, in comments on the preliminary analysis proposal (document 1133), argues that the actions taken by the institution are at a satisfactory stage of implementation of the actions and strategies for the prevention and combat of harassment. Analyzing the additional information provided, it is verified that there were actions for the prevention and combat of harassment within the institution, such as working groups to propose measures for the prevention and combat of harassment, gender study groups, scientific productions, and educational actions carried out on the institution's *campuses*. However, these actions do not cover the entire scope of the institutionalization proposal, as conceived by the methodology of this audit (item 12 of Appendix B). Therefore, despite the actions presented by the institution complying with certain normative guidelines provided for the institutionalization of a policy for the prevention and combat of harassment, such as the implementation of educational actions and the designation of commissions to propose and coordinate actions on the theme of harassment, it is understood that the recommendation should be maintained, as the institutionalization of actions and strategies for the prevention and combat of harassment provides greater robustness to systems and practices and makes legal security within the university public.

11. The federal universities of São del-Rei (UFSJ), Ceará (UFC), Agreste de Pernambuco (Ufape), and the University for International Integration of the Afro-Brazilian Lusophony (Unilab), in responses contained in documents 1134 to 1141, expressed agreement with the proposed measures.

12. The Federal University of Health Sciences of Porto Alegre (UFCSPA) also expressed agreement with the proposed measures (document 1142). However, it suggested the textual inclusion of the expression "sectoral program" in finding III.1, considering the publication of Decree 12.122/2024, given that it has the same objective as the institutionalized policy concept adopted in the description of the finding. The considerations were added to finding III.1 and the proposed measures.

13. The Federal University of Alagoas (Ufal) presented documentation (documents 1143-1148) containing the draft of the new policy for the prevention and confrontation of harassment and forms of discrimination and prejudice (document 1147). The university did not express disagreement with the proposals in the preliminary report. Furthermore, it is noted that Ufal already had an institutionalized policy, but had informed that it was in the process of being updated, a fact corroborated by the new documentation attached to the case. Regarding the policy update, the proposed recommendation was to promote the participation of the entire university community in this process, therefore, at this moment, there is no need to change the proposals made.

14. The Federal University of ABC (UFABC), in its statement (documents 1149-1152), informed that, contrary to what is stated in the individualized analysis report, the training action offered to outsourced employees was carried out by the University City Hall of UFABC. It also provided evidence of the training event. The university cites internal instances for the reception and guidance of victims and witnesses, such as the Permanent Commission for Monitoring the Policy of Sexual and Gender Diversity (CDSG) and the Pro-Rector of Community Affairs and Affirmative Policies (PROAP), but acknowledges the absence of a specific internal regulation for handling

harassment complaints. There is also a plan to create a webpage with information on harassment, the Local Plan for the Prevention and Confrontation of Harassment and Discrimination, and relevant protocols. The cited actions are valid and represent progress within the university, but are not yet completed, justifying the maintenance of the preliminary proposals.

15. UFRGS commented on the presented proposals (documents 1153-1154). It highlighted that, in the report presented in document 987, there were some textual adjustments in relation to the text presented in the feedback meeting with the ten institutions selected for *in loco* visits, but without substantially affecting the content. In summary, it **expressed agreement** with the proposals directed to the institution (document 1154, p. 2).

16. The Federal University of Lavras (UFLA) confirmed awareness of the proposed recommendations, stating that it had no contributions to make (document 1155).

17. The Federal Rural University of Pernambuco (UFRPE), in its statement (document 1156), resented a link to information on complaints and administrative processes involving harassment cases, for the period from 2023 to 2024, and highlighted that there was training for investigation teams on harassment cases. It also provided a link to the institution's Ombudsman. The information sent in the previous link did not allow access, justifying the institution's statement. Regarding the proposed measures, UFRPE considered the "presented recommendations pertinent and is implementing the necessary measures for the institutionalization of a policy for the prevention and combat of harassment" (document 1156, p. 2). In this sense, the proposed recommendation directed to the institution, contained in the findings matrix (document 988), will be maintained.

18. The Federal University of Viçosa (UFV) established the Permanent Commission for the Promotion of Human Rights and Combat of Oppressions (CPDHO) on 18/10/2024, with the objective of implementing actions to effectuate the system for the prevention and combat of harassment at the university (document 1157), without considerations on the proposed recommendations, thus maintaining the preliminary proposal.

19. The Federal University of Juiz de Fora (UFJF) submitted the documentation contained in documents 1158 to 1165, reporting ongoing actions by the Permanent Commission for the Prevention and Combat of Violence and Harassment to develop training and an institutional website that will contain information on harassment. The institution also submitted Consu/UFJF Resolution 78/2023, which provides for the creation of a pool of available staff for conducting preliminary investigations, administrative or disciplinary committees (document 1165). Therefore, although there are ongoing actions, the preliminary proposals are maintained.

20. The Federal Rural University of the Semi-Arid (Ufersa) reported that it is in the process of developing its policy for the prevention and combat of moral and sexual harassment through a working group constituted for this purpose. A training and education program on harassment is also being created, aimed at the entire academic community (document 1166). Considering these are planned or ongoing actions, the recommendation proposals will be maintained.

21. The Federal University of Fronteira Sul (UFFS), in response to the preliminary report (document 1167), pointed out the measures that are underway in the institution for the institutionalization of a policy for the prevention and combat of harassment. There was no objection to the proposed actions.

22. The Federal University of Uberlândia (UFU), in its statement (documents 1168-1169), pointed out some regulations addressing the diversity of audiences within the institution, highlighted that the Ombudsman's channel is available for registering complaints, including harassment, and that this internal unit acts as a space for listening and mediation, ensuring that demands are handled appropriately and confidentially. There was no evidence of the inclusion of outsourced workers

within the institutional policy for the prevention and combat of harassment. Furthermore, there is no “definition of protocols aimed at avoiding revictimization,” justifying the maintenance of the proposals. The institution informed that appropriate measures will be taken to develop a training program and to ensure that the teams and committees responsible for investigating and holding accountable harassment cases are composed according to established guidelines, ensuring that the processes are conducted with a gender perspective (document 1169).

23. The Federal University of Pelotas (Ufpel), in its statement (documents 1170-1171), indicated ongoing measures for the institutionalization of a policy for the prevention and combat of harassment. There was no objection to the proposed actions.

24. The Federal University of Delta do Parnaíba (UFDPAr), in its statement (document 1172), highlighted measures for disseminating relevant legislation on harassment on the page of the Permanent Commission for the Prevention and Combat of Violence. The dissemination of legislation on the topic within the commission does not prevent the dissemination of reporting channels, with relevant legislation to guide the handling of complaints, justifying the maintenance of the proposals directed at UFDPAr.

25. The Federal University of Southern and Southeastern Pará (Unifesspa), in its statement (document 1173), indicated ongoing measures to comply with the recommendation to institutionalize a policy for the prevention and combat of harassment, but these measures have not yet been completed, justifying the maintenance of the proposal.

26. The Federal University of Santa Catarina (UFSC), in its statement (document 1174), highlighted that the proposed actions “are feasible and pertinent.”

27. The Federal University of Cariri (UFCA), in its statement (document 1175), emphasized ongoing measures for the institutionalization of a policy for the prevention and combat of harassment, with the establishment of a Technical Working Group (GTT) for the development of institutionalization actions. In this GTT, there is a work plan for the development of actions, and a diagnosis with the university community is underway. There is no substantial change in the content of the proposed actions directed at the institution, and they should be maintained.

28. The Federal University of São Paulo (Unifesp), in its statement (documents 1176-1177), emphasized that the recommendations will be analyzed and addressed. In this sense, the proposed actions should be maintained.

29. The Federal University of Grande Dourados (UFGD) presents in its response (document 1178) the actions implemented by the institution to prevent and combat harassment. Regarding finding III.3, UFGD highlights the dissemination of the policy to the academic community, including outsourced workers, through discussion circles and visits by the Itinerant Ombudsman, but notes that institutional courses are still in the planning phase, thus justifying the recommendation related to finding III.3. Regarding item III.4, one of the points addressed in its individualized analysis dealt with the lack of clarity regarding the investigation of harassment cases involving students and the protocols for investigation and process management. Concerning students, the university explains that, according to UFGD’s regulations, these cases are investigated by committees formed within the academic units. It also reports that the procedures for investigation and process management are established in chapters IV, V, and VI of Resolution 729/2024. These considerations were analyzed, and it was **decided to withdraw the proposed action related to item a of finding III.4**, while maintaining the other proposals. Finally, UFGD requests the reevaluation of the practices developed, such as discussion circles and the Acalento Project, which were not recognized as best practices. Reconsidering the previous text, the cited actions were included as best practices.

30. The University of Brasília (UnB), in its statement (documents 1179-1183), highlighted the following aspects (document 1179):

a) The flow for handling complaints of harassment, discrimination, and other violence was approved by the Human Rights Council Resolution - CDH 1/2024, published by the Human Rights Council (CDH) and disclosed on the UnB website;

b) The Dean of People Management is planning a specific training program on the newly disclosed flow, as well as specific training for combating harassment, with a gender perspective, in partnership with the Human Rights Secretariat and the Conduct Monitoring and Mediation Advisory (AAMC);

c) The UnB Ethics Committee plays an important consultative and guiding role on the topic of harassment; and

d) The actions of the investigation teams/committees are substantiated by the federal legislation governing the topic, the regulations and recommendations of the Federal Comptroller General, as well as the guidelines of the institution's Human Rights Policy.

31. The publication on the flows and protocols related to harassment cases, indicated in UnB's comments, refers to a notice upon approval on 10/07/2024, but has not yet been effectively disclosed in a specific link on the institutional website. Regarding the training program, the institution indicated the existence of a plan to develop it (document 1179, p. 2). The recommendation for the teams/committees to be constituted and to conduct the processes involving harassment with a gender perspective reinforces the need to comply with the guidelines of the Federal Comptroller General (CGU). In this regard, it is proposed to maintain the proposed actions directed at UnB.

32. The Federal University of Western Pará (Ufopa), in its statement (documents 1184-1188), highlighted the following aspects:

a) The non-submission of information was due to administrative difficulties associated with the strike movement of education workers, as well as the protocol of the extension request directly in the Conecta-TCU system, not constituting, in any measure, disrespect to the jurisdiction of the TCU;

b) A policy for the prevention and combat of discrimination and violence is currently being developed, which is in the final stage of text preparation and should soon be submitted to the University Council (document 1184, p. 2; document 1186); and

c) Submitted information on administrative processes involving harassment cases (document 1188).

33. Based on the information provided by Ufopa, there is still no effectively institutionalized policy (or sectoral plan) for the prevention and combat of harassment, based on current legislation on the subject (especially Law 14.540/2023 and Decree 12.122/2024).

34. Regarding the communication issues in Conecta-TCU, Ufopa recorded the request for an extension as an effective response, limiting the inclusion of new documents. However, considering that the institution provided additional information during the managers' comments stage, it is proposed to withdraw the acknowledgment in the preliminary proposal, without prejudice to maintaining the proposal in finding III.1, given that there is still no institutionalized policy for the prevention and combat of harassment approved in the institution, especially regarding sexual harassment.

35. The Federal University of Amazonas (UFAM), in its statement (document 1189), expressed agreement with the proposed actions.

36. The Federal University of Roraima (UFRR), in its statement (documents 1190-1192), reaffirmed “full agreement with the proposed actions, confirming that the measures suggested by the TCU are already under internal review” (document 1192, p. 2).

37. The Federal University of Rio Grande Foundation (Furg), in its response to the preliminary report (document 1193), addressed the planning of training programs in accordance with current legislation and highlighted the cooperation between the Coordination of Affirmative Actions, Inclusion, and Diversity (CAID) and the Permanent Commission of Disciplinary Administrative Process (CPPAD) in conducting training actions. Specific training for managers and members of the investigation teams are mentioned, as well as the development of norms for the disciplinary investigation procedure for students. The statement also details the promotion of reporting channels and relevant legislation through the university’s electronic channels, with actions by the Ombudsman to engage with the university community and the creation of a guide for filing complaints. Additionally, initiatives for defining and structuring internal instances, including the reception and referral flow of complaints, are described. The highlighted points justify a **correction in the preliminary proposals, excluding item b of finding III.3 and item a of finding III.4**, while maintaining the others.

38. The response demonstrates a commitment to the prevention and combat of harassment, highlighting concrete and planned actions to address the issue comprehensively and systematically.

39. The Federal University of Goiás (UFG) expressed agreement with the proposed actions (document 1194).

40. The Federal University of Recôncavo da Bahia (UFRB), in its statement (documents 1198-1199), made the following considerations:

a) amended the heading of Article 12 of CONSUNI/UFRB Resolution 27, dated 06/07/2024, which establishes the policy for addressing harassment and discrimination within the Federal University of Recôncavo da Bahia, allowing the reception of anonymous complaints, regardless of the complainant’s position in the reported action, demonstrating compliance with the preliminary recommendation of finding III.2 (document 1199);

b) proposed a set of actions for the training of disciplinary committee members, including training guidelines on conducting and judging processes with a gender perspective (document 1198, p. 2); and

c) informed that it will organize information on the topic of harassment in a single site (document 1198, p. 1).

41. Therefore, regarding UFRB, the **proposal related to finding III.2 will be excluded**, considering the amendment made to the internal regulation. As for the other proposals, they will be maintained, considering that the indicated actions will be developed in the future.

42. The Federal University of Paraná (UFPR) communicated that the proposal to establish policies related to the prevention and combat of harassment is awaiting discussion in the University Council (document 1200). There was no disagreement with the proposed actions, so no changes were made to the preliminary report.

43. The Federal University of Tocantins (UFT) presented its statement (documents 1201-1203) reporting that it is in the process of discussing and developing the policy for the prevention and combat of harassment. The institution mentions initiatives to promote an anti-harassment campaign in sports activities and the organization of a live event to discuss the issue, aiming at prevention and

raising awareness among staff and the general community. There were no objections to the proposed actions, resulting in the maintenance of the preliminary report without modifications.

44. The Federal Rural University of Rio de Janeiro (UFRRJ), in its statement (document 1204), reported that on 06/28/2024, the University Council (Consu) approved the protocols for complaints and sexual violence, as well as the Prevention of Violence Guide, and that the mentioned material is available on the institutional website of CPID (Permanent Commission of Institutional Policy for Diversity, Gender, Ethnicity/Race, and Inclusion) (document 1204, p. 3; p. 4-65). These documents were analyzed in the preliminary report (document 987, p. 457-464). Although these are important flowcharts/protocols for the prevention and combat of harassment, according to the preliminary analysis (document 987, p. 457-464), they do not cover all the elements defined in the conception of a policy (or sectoral plan, according to Decree 12.122/2024) for the prevention and combat of harassment, and the preliminary proposal contained in the findings matrix (document 988) and described in finding III.1 should be maintained.

45. The Federal University of Triângulo Mineiro (UFTM), in its statement (document 1205), submitted documents related to the internal procedures of the audit demands (document 1205, p. 1-744) and, after analyzing the preliminary document (document 987) and the findings matrix (document 988), declared to be aware of and in agreement with the proposed actions (document 1205, p. 745).

46. The Federal University of Maranhão (UFMA) expressed agreement with the proposed actions (document 1206).

Appendix B – Methodology Details

1. This audit aimed to evaluate the existence and potential outcomes of systems and practices for the prevention and combat of harassment in federal universities, considering reference standards and best practices.
2. To this end, the following audit questions were addressed:

Table 1 – Audit Questions

Question 1: In federal universities, is there an institutionalized and disseminated policy for the prevention and combat of harassment, formulated through collective participation and involvement in the discussion, regulation, and dissemination of behaviors characterized as harassment, in accordance with the reference standards on the subject (CNJ Resolution 351/2020; TCU Plenary Decision 456/2022; Law 14.540/2023; Law 14.457/2022)?
Question 2: Within federal universities, are institutional campaigns and training programs developed to disseminate information to the university community, provide technical training for support teams and guidance for victims, and investigate harassment cases, based on the reference standards (CNJ Resolution 351/2020; Law 14.540/2023; Law 14.457/2022)?
Question 3: Are the reporting channels and internal units for reception, listening, monitoring, and guidance for people affected by harassment situations within federal universities prepared with service protocols and physical and/or remote structures for formalizing complaints, aiming to ensure effective service to victims and an effective investigation of reported cases, in accordance with the reference standards (CNJ Resolution 351/2020; Law 14.540/2023; Law 14.457/2022; CNJ Resolution 492/2023; TCU Plenary Decision 456/2022)?
Question 4: Have the administrative processes for investigation and accountability of harassment cases in federal universities been conducted by duly qualified and authorized personnel, observing due process, with the adequacy of the evidentiary phase to the reported case and without interference from retaliation and/or corporatism, promoting a gender perspective analysis of harassment cases, based on the reference standards (Law 14.540/2023; CNJ Resolution 351/2020; CNJ Resolution 492/2023; Law 8.112/1990 and Binding Opinion 15/2023/CONSUNIAO/CGU/AGU)?
Question 5: Have the administrative processes for investigation and accountability of harassment cases in federal universities effectively resulted in the punishment of those found guilty, following the completion of the work by the investigation committees, ensuring the principles of due process and in accordance with the relevant legal and regulatory terms, thereby reducing the sense of impunity within the university community, based on the reference standards (Law 14.540/2023; CNJ Resolution 351/2020; CNJ Resolution 492/2023; Law 8.112/1990 and Binding Opinion 15/2023/CONSUNIAO/CGU/AGU)?

Source: Prepared by the audit team

Scope

3. This is a performance audit with a direct report. The results of the measurement of the object, according to the criteria, are presented in the audit report in the form of findings, conclusions, recommendations, or an opinion of the audit team. The audit of the object can also provide new information, analyses, or new perspectives (ISSAI 100 - 29).
4. The performance audit covered the period from 2023 to 2024, considering the publication, from 2023 onwards, of the legislation that guides the theme.
5. The scope of this work encompassed the systems and practices for the prevention and combat of harassment adopted by federal universities, in their various stages (diagnosis, institutionalization, execution, investigation, and monitoring of actions), with a general analysis of the set of 69 federal universities.
6. A more detailed analysis was conducted on the systems and practices for the prevention and combat of harassment adopted by ten federal universities, selected based on **the criterion of regionalization** (two from each geographical region of Brazil). The initial selection of the two units from each region was based on **relevance** (number of undergraduate enrollments), followed by selection based on the **professional judgment** of the team, considering possible best practices, consolidated harassment combat systems, or some differentiated aspect in the treatment of the theme.

Out of Scope

7. The scope of the work did not include individualized processes involving harassment cases in federal universities, mainly considering the sensitivity of the topic under analysis.

Criteria

8. Harassment, in general, is subdivided into two types: moral harassment and sexual harassment.

9. By way of example, the definitions contained in Resolution 351/2020 of the National Council of Justice (BRAZIL, CNJ, 2020) are presented:

Art. 2. For the purposes of this Resolution, the following are considered:

I – **Moral harassment**: violation of the dignity or psychic or physical integrity of another person through abusive conduct, regardless of intent, through the degradation of socio-professional relationships and the work environment. It can be characterized by the demand for unnecessary or exorbitant tasks, discrimination, humiliation, embarrassment, isolation, social exclusion, defamation, or humiliating and embarrassing situations likely to cause suffering, physical or psychological harm;

III – **Sexual harassment**: conduct of a sexual nature practiced against someone's will, in verbal, non-verbal, or physical form, manifested through words, gestures, physical contact, or other means, with the effect of disturbing or constraining the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating, or destabilizing environment.

10. The International Labour Organization (ILO), in its Convention 190, defines violence and **harassment in the world of work** as a “range of unacceptable behaviors and practices, or threats of such behaviors and practices, whether they occur once or repeatedly, that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm, including gender-based violence and harassment.”

11. The Guia Lilás from the Office of the Comptroller General (CGU) provides the following **definition for moral harassment**: “it consists of the violation of the dignity or psychic or physical integrity of another person through abusive conduct. It manifests through gestures, words (oral or written), behaviors, or attitudes that expose the civil servant, employee, intern, or contractor, individually or in a group, to humiliating and embarrassing situations, degrading the work environment and often impacting the emotional and physical stability of the victim” (BRAZIL, CGU, 2023).

12. Considering the provisions of ILO Convention 190, as well as Laws 14.540/2023 and 14.457/2022, the conception of **institutionalizing** a policy for the prevention and combat of harassment was adopted based on the following principles:

- a) legal prohibition of violence and harassment;
- b) ensuring that relevant policies address violence and harassment;
- c) adopting a comprehensive strategy to implement measures to prevent and combat violence and harassment;
- d) establishing or strengthening inspection and monitoring mechanisms;
- e) guaranteeing access to resources and support for victims;
- f) providing for sanctions;
- g) developing tools, guidance, education, and training, and raising awareness, in accessible formats as appropriate; and
- h) ensuring effective means of inspection and investigation of cases of violence and harassment, including through labor inspections or other competent bodies.

13. The main legal and sub-legal evaluation criteria adopted in this audit work were:

- a) Guia Lilás: Guidelines for the Prevention and Treatment of Moral and Sexual Harassment and Discrimination in the Federal Government 2023 - Normative Ordinance SE/CGU

58, of 3/7/2023 (Office of the Comptroller General; 2023) and Policy for Combating Moral and Sexual Harassment and Discrimination of the Office of the Comptroller General (Office of the Comptroller General, 2023);

b) CNJ Resolution 351, of 10/28/2020 - Establishes, within the Judiciary, the Policy for the Prevention and Combat of Moral and Sexual Harassment and Discrimination (National Council of Justice, 2020);

c) CNJ Resolution 492, of 3/17/2023 - Established guidelines for adopting a Gender Perspective in judgments throughout the Judiciary, as per the protocol approved by the Working Group constituted by CNJ Ordinance 27/2021, mandated training for judges related to human rights, gender, race, and ethnicity from an intersectional perspective, and created the Committee for Monitoring and Training on Gender Perspective Judgments in the Judiciary and the Committee for Encouraging Female Institutional Participation in the Judiciary;

d) Law 14.540/2023, of 4/3/2023 - Establishes the Program for the Prevention and Combat of Sexual Harassment and other Crimes against Sexual Dignity and Sexual Violence within the public administration, at federal, state, district, and municipal levels;

e) Law 14.457/2022, of 9/21/2022 - Establishes the Employ + Women Program; and amends the Consolidation of Labor Laws. Chapter VII establishes measures for the prevention and combat of sexual harassment and other forms of violence in the workplace;

f) Decree 12.122/2024, of 7/30/2024 - Establishes the Federal Program for the Prevention and Combat of Harassment and Discrimination within the direct, autarchic, and foundational federal public administration;

g) Decision 456/2022 – TCU – Plenary (Reporting Minister Walton Alencar Rodrigues) - Systems for the prevention and combat of moral and sexual harassment in the Federal Public Administration (suggested model);

h) Guidance note on campus violence prevention and response – The “guidance note on campus violence prevention and response” offers practical guidelines for addressing violence against women in universities and presents a series of actions that universities can adopt to ensure an institutional environment conducive to the prevention and response to violence against women, meeting the needs of survivors through the provision of adequate services and preventing violence at multiple levels;

i) Manual for Public Policy Evaluation: a practical guide for ex-ante analysis. Brasília: Civil House of the Presidency of the Republic, 2018; and

j) TCU Public Policy Control Framework (2020), mainly regarding problem diagnosis; analysis of alternatives and decision-making; policy design and institutionalization; and policy monitoring and evaluation.

Visited Locations

14. The criterion for choosing the locations to be visited during the audit execution phase was **regionalization** (two federal universities from each region of Brazil). The two institutions from each region were selected based on **relevance** (number of undergraduate students) and **professional judgment** criteria (possible best practices or some relevant aspect regarding the theme of harassment).

15. The ten federal universities selected for on-site visits during the execution of the work were: University of Brasília (UnB), Federal University of Goiás (UFG), Federal University of Acre (UFAC), Federal University of Amazonas (UFAM), Federal University of Minas Gerais (UFMG), Federal University of Ouro Preto (UFOP), Federal University of Maranhão (UFMA), Federal

University of Pernambuco (UFPE), Federal University of Rio Grande do Sul (UFRGS), and Federal University of Santa Catarina (UFSC).

16. Due to the floods that affected the State of Rio Grande do Sul in May and June 2024, the activities conducted with UFRGS were carried out remotely via the Microsoft Teams platform.

Data Collection and Analysis Procedures

17. This audit process is guided by the Intosai Development Initiative (IDI), which outlines the following steps in conducting the work:

- a) selection of the topic to be audited;
- b) audit design;
- c) audit execution;
- d) development of findings, conclusions, and recommendations;
- e) reporting; and
- f) monitoring of audit results.

18. Within the scope of the IDI's Equal Futures Audit Changemakers program, the topic of moral and sexual harassment in federal universities was chosen, as per the audit proposal authorized through Decision 519/2024-TCU-Plenary (Reporting Minister Aroldo Cedraz).

19. To adequately address the audit issues, the following data collection techniques were adopted and listed in the planning matrix:

- a) Exploratory meetings with managers and specialists on the audit subject;
- b) Official letters requesting/requiring information;
- c) Reference panel presenting the findings;
- d) Focus groups with outsourced workers, students, technical-administrative staff, and faculty from ten federal universities selected for on-site visits;
- e) Knowledge production;
- f) Document review;
- g) Legal review.

20. The description of the information and documents requested from the 69 federal universities is included in the working paper that resulted in the individualized analysis of the responses to the audit request (document 987).

21. Through the analysis of all the information obtained, it was possible to develop the findings matrix (document 988) and the resulting audit report, based on content analysis techniques and document/legal review, which pointed out the lack of institutionalization of harassment prevention and combat policies in 41 federal universities, weaknesses in training actions and dissemination of actions and strategies involving the harassment theme, gaps in the definition of internal structures and in the protocols/flowcharts for receiving, guiding, and forwarding harassment complaints, as well as in the protocols/flowcharts for investigating harassment cases, resulting in proposals for recommendations and notifications to the audited universities, as stated in the "Proposal for Forwarding" section of this report.

Limitations

22. The following limitations were imposed on the work associated with the methodology used to investigate the audit issues:

- a) lack of responses to the audit request from two federal universities;
- b) denial of access to information on general aspects of administrative processes involving harassment cases (claim of confidentiality) by one federal university;
- c) failure to provide information on the existence or non-existence of protocols/flowcharts to avoid the risk of re-victimization, due to limitation/absence in the information sent by the following federal universities: UFCG, Ufopa, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFSM, UFV, UnB, Unifal-MG, and Unipampa.

23. As a consequence of these limitations, it was not possible to analyze the structure for receiving, guiding, forwarding complaints, and investigating cases involving harassment at the federal universities UFCG and Ufopa.

24. Furthermore, there was no conclusive evaluation of the protocols adopted to avoid re-victimization in harassment cases at the following federal universities: UFCG, Ufopa, UFRRJ, UFS, UFSB, UFSC, Ufscar, UFSJ, UFSM, UFV, UnB, Unifal-MG, and Unipampa.

Compliance with the Audit Standards of the Brazilian Federal Court of Accounts

25. The analyses and final conclusions of this work were carried out in accordance with the audit standards and techniques accepted by the Brazilian Federal Court of Accounts.

26. All evidence collected during the execution of the work was subjected to tests of sufficiency, relevance, and reliability.

27. Additional details of the planning process, as well as the methods and techniques scheduled for the execution of the audit work, are included in the audit plan, with the respective planning matrix (document 986).

List of Acronyms

AGU	Attorney General
Andifes	National Association of Directors of Federal Higher Education Institutions
AudEducação	Audit Department for Education, Culture, Sports and Human Rights
CDGEN	Coordination of Sexual Diversity and Combating Gender Violence at the Federal University of Santa Catarina
Censup	National Higher Education Census
CNJ	National Justice Council
Consu/Consun/Consuni/Cuni	University Council
CGU	Comptroller General
CONUNIAO	Office of the Attorney General of the Union
Dicor	Directorate of Management of the Federal Executive Branch Correction System
DMD	Directorate of Women and Diversity
FSDL	Analysis of Fragmentations, Overlaps, Duplications, and Gaps
Furg	Federal University of Rio Grande Foundation
IBGE	Brazilian Institute of Geography and Statistics
IDI	Intosai Development Initiative
IES	Higher Education Institution(s)
Inep	Anísio Teixeira National Institute for Educational Studies and Research
Intosai	International Organization of Supreme Audit Institutions
Issai	International Standards of Supreme Audit Institutions
KPMG	Klynveld Peat Marwick Goerdeler
LGBTQIAPN+	Lesbians, Gays, Bisexuals, Transgender, Queer/Questioning, Intersex, Asexuals/Agender, Pangender/Polygender, Non-binary, and more
MEC	Ministry of Education
MGI	Ministry of Management and Innovation in Public Services
MSC	Message of Agreements, Conventions, Treaties, and International Acts
Nase	Student Health Care Center of the Federal University of Pernambuco
NAT	Audit Standards of the Federal Court of Accounts
ILO	International Labour Organization
<i>Olacefs</i>	Organization of Latin American and Caribbean Supreme Audit Institutions
PET	Strategic Planning of the Federal Court of Accounts
PFPEAD	Federal Program for the Prevention and Combat of Harassment and Discrimination in the Federal Public Administration
QVT	Quality of Work Life
SDH	Human Rights Secretariat
SecexDesenvolvimento	Department of External Control for Sustainable Development
SDGs	Sustainable Development Goals
Siafi	Integrated Financial Administration System of the Federal Government
STF	Supremo Tribunal Federal
TCU	Federal Court of Accounts
TST	Superior Labor Court

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General Secretariat of External Control (Segecex)

Department of External Control for Sustainable Development (SecexDesenvolvimento)

Audit Department for Education, Culture, Sports and Human Rights (AudEducação)

UFABC	Federal Foundation University of ABC
Ufac	Federal Foundation University Acre
Ufal	Federal University of Alagoas
Ufam	Foundation University of Amazonas
Ufape	Federal University of the Agreste of Pernambuco
UFBA	Federal University of Bahia
UFC	Federal University of Ceará
UFCA	Federal University of Cariri
UFCat	Federal University of Catalão
UFCG	Federal University of Campina Grande
UFCSPA	Federal Foundation University of Health Sciences of Porto Alegre
UFDFPar	Federal University of the Delta of Parnaíba
Ufersa	Federal Rural University of the Semi-Arid
Ufes	Federal University of Espírito Santo
UFF	Federal University Fluminense
UFFS	Federal University of the Fronteira Sul
UFG	Federal University of Goiás
UFGD	Federal Foundation University of Grande Dourados
UFJ	Federal University of Jataí
UFJF	Federal University of Lavras
UFJVM	Foundation Federal University of Maranhão
UFLA	Federal University of Minas Gerais
UFMA	Federal Foundation University of Mato Grosso do Sul
UFMG	Federal Foundation University of Mato Grosso
UFMS	Federal University of Northern Tocantins
UFMT	Federal University of Western Bahia
UFNT	Federal Foundation University of Ouro Preto
Ufob	Federal University of Western Pará
Ufop	Federal University of Pará
Ufopa	Federal University of Paraíba
UFPA	Federal University of Pernambuco
UFPB	Federal University of Pelotas
UFPE	Federal University of Lavras
UFPel	Foundation Federal University of Maranhão
UFPI	Federal Foundation University of Piauí
UFPR	Federal University of Paraná
UFR	Federal University of Rondonópolis
Ufra	Federal Rural University of the Amazon
UFRB	Federal University of the Recôncavo of Bahia
UFRGS	Federal University of Rio Grande do Sul
URJ	Federal University of Rio de Janeiro

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UFRN	Federal University of Rio Grande do Norte
UFRPE	Federal Rural University of Pernambuco
UFRR	Federal University of Roraima
UFRRJ	Federal Rural University of Rio de Janeiro
UFS	Federal Foundation University of Sergipe
UFSB	Federal University of Southern Bahia
UFSC	Federal University of Santa Catarina
Ufscar	Federal Foundation University of São Carlos
UFSJ	Federal Foundation University of São João Del Rei
UFSM	Federal University of Santa Maria
UFT	Federal Foundation University of Tocantins
UFTM	Federal University of the Triângulo Mineiro
UFU	Federal Foundation University of Uberlândia
UFV	Federal Foundation University of Viçosa
UFVJM	Federal University of the Jequitinhonha and Mucuri Valleys
UN	United Nations
UnB	Foundation University of Brasília
Unifal-MG	Federal University of Alfenas/Minas Gerais
Unifap	Federal Foundation University of Amapá
Unifei	Federal University of Itajubá/Minas Gerais
Unifesp	Federal University of São Paulo
Unifesspa	Federal University of the South and Southeast of Pará
Unila	Federal University for Latin American Integration
Unilab	University for International Integration of the Afro-Brazilian Lusophony
Unipampa	Federal Foundation University of Pampa
Unir	Federal Foundation University of Rondônia
Unirio	Federal University of the State of Rio de Janeiro
Univasf	Federal Foundation University of Vale do São Francisco
UTFPR	Federal University of Technology – Paraná



Appendix C – Proposal of Measures (Institutions without Institutionalized Policy)

Appendix C		
Federal University	Acronym	Proposal of Measures
Federal Foundation University Acre	UFAC	Recommend adopting measures for the institutionalization of a policy (or sectoral plan, as per the terminology of Decree 12.122/2024) for the prevention and combat of harassment, with the involvement and participation of the university community. This aims at defining conduct, developing flowcharts/protocols for reception, guidance, reporting, and investigation/accountability of harassment cases, with the definition of competencies of internal units related to the topic and guidance on procedural conduct with a gender perspective. Additionally, establish a training and education program on harassment, with wide dissemination within the institution, in accordance with the normative provisions of Law 14.540/2023, Law 14.457/2022, Decree 12.122/2024, Decision 456/2022-TCU/Plenary (Rapporteur Walton Alencar Rodrigues), CNJ Resolutions 351/2020 and 492/2023, the Lilac Guide, and Technical Note 1869/2024/CGUNE/DICOR/CRG (Office of the Comptroller General).
Foundation University of Amazonas	UFAM	
Federal University of the Agreste of Pernambuco	Ufape	
Federal University of Bahia	UFBA	
Federal University of Ceará	UFC	
Federal University of Cariri	UFCA	
Federal University of Catalão	UFCat	
Federal Foundation University of Health Sciences of Porto Alegre	UFCSPA	
Federal Rural University of the Semi-Arid	Ufersa	
Federal University of Espírito Santo	UFES	
Federal University Fluminense	UFF	
Federal University of the Fronteira Sul	UFFS	
Foundation Federal University of Maranhão	UFMA	
Federal University of Minas Gerais	UFMG	
Federal Foundation University of Mato Grosso	UFMT	
Federal University of Northern Tocantins	UFNT	
Federal University of Western Pará	Ufopa	
Federal University of Paraíba	UFPB	
Federal University of Pernambuco	UFPE	
Federal University of Pelotas	UFPeI	
Federal Foundation University of Piauí	UFPI	
Federal University of Paraná	UFPR	
Federal Rural University of the Amazon	UFRA	
Federal University of Rio de Janeiro	UFRJ	

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Federal Rural University of Pernambuco	UFRPE
Federal Rural University of Rio de Janeiro	UFRRJ
Federal Foundation University of Sergipe	UFS
Federal University of Southern Bahia	UFSB
Federal University of Santa Catarina	UFSC
Federal Foundation University of São João Del Rei	UFSJ
Federal Foundation University of Tocantins	UFT
Federal University of the Triângulo Mineiro	UFTM
Federal University of Alfenas	Unifal
Federal Foundation University of Amapá	Unifap
Federal University of São Paulo	Unifesp
Federal University of the South and Southeast of Pará	Unifesspa
Federal University for Latin American Integration	Unila
University for International Integration of the Afro-Brazilian Lusophony	Unilab
Federal University of the State of Rio de Janeiro	Unirio
Federal Foundation University of Vale do São Francisco	Univasf
Federal University of Technology – Paraná	UTFPR



Appendix D – Proposal of Measures (Institutions with Institutionalized Policy)

Appendix D		
Federal University	Acronym	Proposal of Measures
Federal University Foundation of Rio Grande	Furg	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>c) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Foundation Federal University of ABC	UFABC	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p>



		<p>b) promote the dissemination of accessible channels for reporting harassment, as well as the relevant legislation, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p> <p>c) promote the definition of the internal structures for the reception, guidance, and forwarding of specific harassment reports, with the integration of internal units, in accordance with Law 14.540/2023 (Article 4, item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, item II), Decree 12.122/2024 (Article 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (finding III.4);</p> <p>d) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>e) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Alagoas	Ufal	<p>Recommendations:</p> <p>a) adopt measures that promote the participation of the entire university community in the processes of monitoring and evaluating the policy (or sectoral plan, as per the terminology of Decree 12.122/2024), in accordance with Article 4 and Article 5, item I, of Decree 12.122/2024 (finding III.2);</p> <p>b) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p>



		<p>c) promote the dissemination of accessible channels for reporting harassment, as well as the relevant legislation, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p> <p>d) promote the definition of the internal structures for the reception, guidance, and forwarding of specific harassment reports, with the integration of internal units, in accordance with Law 14.540/2023 (Article 4, item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, item II), Decree 12.122/2024 (Article 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (finding III.4);</p> <p>e) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>f) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Campina Grande	UFCG	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as the relevant legislation, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p>



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		<p>c) take measures to ensure that the investigation and accountability teams/committees conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p> <p>Notify, based on Article 9, item I, of TCU Resolution 315/2020, the Federal University of Campina Grande (UFCG) that failure to comply with diligence within the set deadline without justified cause, and the withholding of documents or information during inspections or audits conducted by the Court, violates the provisions of Article 58, items IV and VI, of Law 8.443/1992 (Organic Law of the Federal Court of Accounts).</p>
Federal University of Delta of Parnaíba	UFDPa	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as the relevant legislation, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p> <p>c) promote the definition of the internal structures for the reception, guidance, and forwarding of specific harassment reports, with the integration of internal units, in accordance with Law 14.540/2023 (Article 4, item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, item II), Decree 12.122/2024 (Article 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (finding III.4);</p> <p>d) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree</p>



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		<p>12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4); and</p> <p>e) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Goiás	UFG	<p>Recommendations:</p> <p>a) promote the insertion of a link on the institution's homepage regarding the actions and strategies for preventing and combating harassment, with the dissemination of the reception, guidance, reporting, and investigation protocols for harassment cases, in compliance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3).</p>
Federal University of Itajubá	Unifei	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3); and</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3); and</p> <p>c) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Foundation Federal University of Grande Dourados	UFGD	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception,</p>



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		<p>guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p> <p>c) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4); and</p> <p>d) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Jataí	UFJ	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p>



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		<p>c) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>d) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Juiz de Fora	UFJF	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3); and</p> <p>b) promote the dissemination of accessible channels for reporting harassment, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3).</p>
Federal University of Lavras	UFLA	<p>Recommendations:</p> <p>a) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>b) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p>



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		c) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).
Federal Foundation University of Mato Grosso do Sul	UFMS	Without a referral proposal
Federal University of Western Bahia	UFOB	<p>Recommendations:</p> <p>a) take measures to review the actions and strategies for preventing and combating harassment to ensure their reach to the entire university community, in accordance with Article 3, §1 and Article 5, item I, of Decree 12.122/2024; Article 5, item I, of CNJ Resolution 351/2020 (finding III.2);</p> <p>b) develop and implement a training program on sexual and moral harassment, with updated courses, including: training on the reception, guidance, and reporting protocols; and training for the teams investigating harassment cases, with a gender perspective, based on Article 5, item VII, of Law 14.540/2023 and Article 7, item I, of Decree 12.122/2024 (finding III.3);</p> <p>c) promote the dissemination of accessible channels for reporting harassment, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, items IV and V, of Law 14.540/2023 (finding III.3);</p> <p>d) promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for the reception and guidance on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>e) take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, in accordance with the guidelines contained in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal Foundation University of Ouro Preto	UFOP	Without a referral proposal
Federal University of Pará	UFPA	Recommendations:



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		<p>a) Take measures to review actions and strategies for preventing and combating harassment to ensure they reach the entire university community, in accordance with Article 3, §1 and Article 5, item I of Decree 12.122/2024; Article 5, item I of CNJ Resolution 351/2020 (finding III.2);</p> <p>b) Develop and implement a training program on sexual and moral harassment, with updated courses that include: training on the reception, guidance, and reporting protocols; and training for teams investigating harassment cases, with a gender perspective, based on Article 5, item VII of Law 14.540/2023 and Article 7, item I of Decree 12.122/2024 (finding III.3);</p> <p>c) Promote the definition and structuring of internal instances for the reception, guidance, and referral of specific harassment cases, integrating internal units, in accordance with Law 14.540/2023 (Article 4, item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, item II), Decree 12.122/2024 (Article 2, items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (finding III.4);</p> <p>d) Promote the definition of protocols to avoid re-victimization, by developing a flowchart/protocol for the reception and guidance on reports, disseminating it to the university community, in accordance with Law 14.540/2023 (Article 5, items III and VI), Decree 12.122/2024 (Article 2, items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (finding III.4);</p> <p>e) Take measures to ensure that investigation and accountability teams/committees are composed and conduct and judge processes involving harassment with a gender perspective, in accordance with the guidelines of TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (finding III.5).</p>
Federal University of Rondonópolis	UFR	<p>Recommendations:</p> <p>a) Develop and implement a training program on sexual and moral harassment, including updated courses that cover: training on the procedures/protocols for welcoming, guidance, and reporting; and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>b) Promote the dissemination of accessible channels for reporting harassment practices, as well as publish the relevant legislation on the university's</p>



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		<p>institutional website, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>c) Promote the definition and structuring of internal bodies for welcoming, guiding, and forwarding reports of specific harassment cases, integrating internal units, in accordance with Law 14.540/2023 (Article 4, Item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, Item II), Decree 12.122/2024 (Article 2, Items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (Finding III.4);</p> <p>d) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2, Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (Finding III.4); and</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal University of Recôncavo da Bahia	UFRB	<p>Recommendations:</p> <p>a) Promote the dissemination of accessible channels for reporting harassment practices, as well as publish the relevant legislation on the university's institutional website, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>b) Take measures to ensure that the investigation and accountability teams/committees follow the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (conducting and judging processes with a gender perspective) in handling harassment cases (Finding III.5).</p>
Federal University of Rio Grande do Sul	UFRGS	<p>Recommendations:</p> <p>a) Take measures to review the actions and strategies for preventing and combating harassment to ensure they reach the entire university community,</p>



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		<p>in accordance with Article 3, §1 and Article 5, Item I of Decree 12.122/2024; Article 5, Item I of CNJ Resolution 351/2020 (Finding III.2);</p> <p>b) Promote the inclusion of a link on the institution's homepage about the actions and strategies for preventing and combating harassment, with the dissemination of the procedures/protocols for welcoming, guidance, reporting, and investigating harassment cases, in compliance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3); and</p> <p>c) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2, Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (Finding III.4).</p>
Federal University of Rio Grande do Norte	UFRN	<p>Recommendations:</p> <p>a) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3); and</p> <p>b) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal University of Roraima	UFRR	<p>Recommendations:</p> <p>a) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>b) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>c) Complete the process of defining and structuring internal bodies for attending and welcoming specific harassment cases, and promote the</p>



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		<p>development of a flowchart for welcoming and guiding on reports, with dissemination to the university community (Finding III.4); and</p> <p>d) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal Foundation University of São Carlos	Ufscar	<p>Recommendations:</p> <p>a) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>b) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>c) Promote the definition and structuring of internal bodies for welcoming, guiding, and forwarding reports of specific harassment cases, integrating internal units, in accordance with Law 14.540/2023 (Article 4, Item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, Item II), Decree 12.122/2024 (Article 2, Items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (Finding III.4);</p> <p>d) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2, Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (Finding III.4); and</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>



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Federal University of Santa Maria	UFSM	<p>Recommendations:</p> <p>a) Take measures to review the actions and strategies for preventing and combating harassment to ensure they reach the entire university community, in accordance with Article 3, §1 and Article 5, Item I of Decree 12.122/2024; Article 5, Item I of CNJ Resolution 351/2020 (Finding III.2);</p> <p>b) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>c) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>d) Take measures to structure internal bodies for attending and welcoming specific harassment cases, in accordance with guiding norms, especially regarding the flow of forwarding reports and conducting investigations of harassment cases, with dissemination to the university community (Finding III.4);</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal Foundation University of Uberlândia	UFU	<p>Recommendations:</p> <p>a) Take measures to review the actions and strategies for preventing and combating harassment to ensure they reach the entire university community, in accordance with Article 3, §1 and Article 5, Item I of Decree 12.122/2024; Article 5, Item I of CNJ Resolution 351/2020 (Finding III.2);</p> <p>b) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p>



		<p>c) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>d) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2, Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (Finding III.4); and</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal Foundation University of Viçosa	UFV	<p>Recommendations:</p> <p>a) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>b) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>c) Promote the definition and structuring of internal bodies for welcoming, guiding, and forwarding reports of specific harassment cases, integrating internal units, in accordance with Law 14.540/2023 (Article 4, Item II, and Article 5, §§1 and 2), Law 14.457/2022 (Article 23, Item II), Decree 12.122/2024 (Article 2, Items II and IV), and the guidelines of CNJ Resolution 351/2020 (Articles 7 to 14) (Finding III.4);</p> <p>d) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2,</p>



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		<p>Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II) (Finding III.4); and</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal University of the Jequitinhonha and Mucuri Valleys	UFVJM	<p>Recommendations:</p> <p>a) Take measures to institutionalize a policy for the prevention and combat of moral harassment, involving and engaging the university community, in accordance with the guidelines provided in Decree 12.122/2024 (Finding III.2);</p> <p>b) Adopt measures that promote the participation of the entire university community in the processes of monitoring and evaluating the policy (or sectoral plan, as per the terminology of Decree 12.122/2024), in accordance with Article 4 and Article 5, Item I of Decree 12.122/2024 (Finding III.2);</p> <p>c) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>d) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3); and</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Foundation University of Brasília	UnB	<p>Recommendations:</p> <p>a) Promote the inclusion of a link on the institution's homepage about the policy for preventing and combating harassment, with the dissemination of the</p>



		<p>procedures/protocols for welcoming, guidance, reporting, and investigating harassment cases, in compliance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>b) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, widely publicizing the program to the university community, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3); and</p> <p>c) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
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Federal Foundation University of Pampa	Unipampa	<p>Recommendations:</p> <p>a) Take measures to review the actions and strategies for preventing and combating harassment to ensure they reach the entire university community, in accordance with Article 3, §1 and Article 5, Item I of Decree 12.122/2024; Article 5, Item I of CNJ Resolution 351/2020 (Finding III.2);</p> <p>b) Adopt measures that promote the participation of the entire university community in the processes of monitoring and evaluating the policy (or sectoral plan, as per the terminology of Decree 12.122/2024), in accordance with Article 4 and Article 5, Item I of Decree 12.122/2024 (Finding III.2);</p> <p>c) Promote the inclusion of a link on the institution's homepage about the actions and strategies for preventing and combating harassment, with the dissemination of the procedures/protocols for welcoming, guidance, reporting, and investigating harassment cases, in compliance with Article 5, Items IV and V of Law 14.540/2023 (Finding III.3);</p> <p>d) Promote the definition of protocols aimed at avoiding re-victimization, through the development of a flowchart/protocol for welcoming and guiding on reports, with dissemination to the university community, in accordance with Law 14.540/2023 (Article 5, Items III and VI), Decree 12.122/2024 (Article 2, Items VI, VII, and VIII), and CNJ Resolution 351/2020 (Annex II);</p> <p>e) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
Federal Foundation University of Rondônia	Unir	<p>Recommendations:</p> <p>a) Develop and implement a training program on sexual and moral harassment, including updated courses, training on the procedures/protocols for welcoming, guidance, and reporting, and training for teams investigating harassment cases with a gender perspective, based on Article 5, Item VII of Law 14.540/2023 and Article 7, Item I of Decree 12.122/2024 (Finding III.3);</p> <p>b) Promote the dissemination of accessible channels for reporting harassment practices, as well as the relevant legislation, in accordance with Article 5, Items IV and V of Law 14.540/2023; and</p>



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		<p>c) Take measures to ensure that the investigation and accountability teams/committees are composed of and conduct the processes involving harassment with a gender perspective, as per the guidelines in TECHNICAL NOTE 1869/2024/CGUNE/DICOR/CRG, based on CNJ Resolution 492/2023 (Finding III.5).</p>
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