


BETWEEN THE INADEQUATE AND THE ILLICIT: THE DIFFERENCE BETWEEN CONDUCT OF SEXUAL CONNOTATION AND SEXUAL HARASSMENT IN THE FEDERAL PUBLIC ADMINISTRATION <https://doi.org/10.63330/aurumpub.023-005>**Ana Paula Myszczyk¹, Candida J. Leopoldino² and Ney Lyzandro Tabalipa³****ABSTRACT**

More than acknowledging that sexual violence and harassment have always existed, it is imperative to understand, prevent, and confront them—especially within Public Administration, which should constitute a space of ethics, safety, and professionalism. Harassment manifests itself in multiple forms, leaves deep marks on victims, and reproduces systemically in institutions, with emphasis on public institutions, the central object of this study. This is an integrative qualitative study whose main objective is to analyze the conceptual differentiation and the method of quantifying conduct of sexual connotation and sexual harassment within Brazil's Federal Public Administration. To this end, the study examined the Program for the Prevention and Confrontation of Sexual Harassment and Other Crimes against Sexual Dignity and Sexual Violence (Law No. 14,504/2023), the Sectoral Plan for Combating Harassment of the Office of the Comptroller General (CGU, 2024), as well as data extracted from the CGU's "Resoluiu?" and "Correição em Dados" dashboards regarding sexual harassment complaints recorded in agencies of the Federal Executive Branch from January 2015 to August 2025. The data were submitted to critical analysis, with the aim of identifying thematic patterns and comparing results. The findings show that, although the topic has been gaining institutional and normative relevance, its complexity requires intentional and structural change in institutional practices, since such conduct constitutes an urgent and multidimensional problem in public institutions, with significant negative impacts on mental health, quality of life, and professional performance.

Keywords: Sexual harassment; Sexual conduct; Public administration.

¹ Faculty member at UTFPR/Curitiba. Attorney. Postdoctoral studies in Medio Ambiente y Recursos Naturales – Universidad de Pinar del Río (Cuba). Postdoctoral studies in Bioethics – PUC/PR. PhD in Economic and Socio-Environmental Law – PUC/PR. ORCID: <https://orcid.org/0000-0003-0232-0449>

² Faculty member at IFPR/Coronel Vivida. Attorney. Postdoctoral candidate in Public Planning and Governance at UTFPR. PhD in Law - UFPR.

³ Faculty member at UTFPR/Pato Branco. Attorney. Postdoctoral studies in Geology at the University of Siena/Italy. ORCID: <https://orcid.org/0000-0002-2006-9166>



INTRODUCTION: AN OLD PROBLEM WITH NEW PERSPECTIVES

The fact that, at times, violence is little discussed does not mean it does not occur frequently, particularly in public settings.

On the contrary, in most cases the harasser occupies a hierarchically superior role to the victim, who, not knowing whom to turn to and fearing impunity, prefers to remain silent—exactly as in cases of domestic violence. These data underscore the urgency of intensifying debates and implementing actions aimed at preventing and confronting these practices in the academic environment.

Because by recognizing violence as a public health issue, the World Health Organization (WHO) draws attention to the consequences of violence for all involved (Maito, Panúncio-Pinto & Vieira, 2022; Gomes, Lopes & Nascimento, 2024). The WHO itself classifies interpersonal violence (IPV) into two categories: family/intimate partner violence and community violence, that which occurs between people who may or may not know each other—exactly as can occur in educational institutions.

From this perspective, addressing harassment necessarily implies looking at ourselves and recognizing the presence of a phenomenon of global reach that demands careful attention to the context in which we are inserted. It is an invitation to rethink the “local,” in the sense of making it healthier, more welcoming, and guided by empathy. Harassment practices directly impact the institutional climate and compromise people’s quality of life, which leads to the need for constant concern with individual and collective well-being, as well as with building relationships based on cooperation and harmonious coexistence in shared spaces.

The occurrence—and above all, the recurrence—of harassment situations constitutes a violation of Human Rights insofar as it affects not only human dignity but also liberty, honor, image, privacy, and other fundamental, individual, and indivisible rights. Cases of sexual violence or sexual harassment can be found at the most varied everyday levels. And this is grave violence and an affront to the most intimate and reserved rights.

In this vein, Freitas (2023) emphasizes that the principle of human dignity must constitute the central axis of legal interpretation in cases of violations occurring in institutional settings, ensuring adequate, fair, and effective responses to victims. The incorporation and rigorous application of this principle strengthen the performance of public (and also private) institutions both in prevention and in confronting the multiple forms of violence, especially those of a sexual nature, in line with the constitutional foundations of equality, non-discrimination, and human dignity (Barreto, 2005; Freitas, Heloani & Barreto, 2008; Hirigoyen, 2011).

Given the foregoing, the objective of this research is to investigate the conceptual difference between conduct of sexual connotation and sexual harassment in the quantification of complaints, the opening of administrative proceedings, and, consequently, the imposition of sanctions within the Federal



Public Administration, by analyzing data obtained from the CGU's "Resolheu?" and "Correição em Dados" dashboards on complaints of conduct of sexual connotation and sexual harassment in agencies of the Federal Executive Branch from January 2015 to August 2025.

In addition to the introductory aspects, the present study is structured as follows: the next item presents the data collection methodology; the third item reports the results found, as well as their analysis; and, finally, the main conclusions of the study, its contributions to the literature, and its limitations are highlighted.

METHODOLOGY OF DATA COLLECTION

To achieve the proposed objective, and based on Decree No. 9,203 of 11/22/2017, which instituted the governance policy in the federal public administration, as well as the Access to Information Law (LAI) (Law No. 12,527 of 11/18/2011), which regulates art. 5, XXXIII; art. 37, §3, II; and art. 216, §2 of the 1988 Federal Constitution, ensuring the fundamental right of access to information produced and/or stored by agencies and entities of the Union, States, Federal District, and Municipalities, the methodological path of the study was divided mainly into two phases. The first comprised analysis of the database available on the Office of the Comptroller General's (CGU) "Resolheu?" dashboard concerning sexual harassment complaints in agencies of the Federal Executive Branch from January 2015 to August 2025, analyzing the handling of complaints.

The second phase comprised verification of the database available on the CGU's "Correição em Dados" dashboard concerning the opening of administrative procedures as well as the imposition or not of sanctions.

The development of this study was structured in successive stages, as described below. In the first stage, the guiding research questions were formulated, adopting the PCC strategy (population, concept, and context), as recommended by the Joanna Briggs Institute (JBI, 2014). According to these elements, the following structure was established: P – Federal Executive Branch of Brazil; C – sexual harassment; and C – from January 2015 to August 2025.

Once the sources of the research were identified and characterized, the guiding questions were formulated: (1) What is, in available numbers, the quantity of sexual harassment complaints from January 2015 to August 2025 in Brazil's Federal Executive Branch? (2) How were harassment complaints handled/forwarded within the above period and locations? (3) What is the difference in conceptualization between conduct of sexual connotation and sexual harassment for Brazil's public administration?

From these questions, the first phase of the study began, substantiated in a meticulous search on the CGU's "Resolheu?" dashboard. There, the subject "sexual harassment" was selected within the



intended analysis period. The “federal” sphere was selected in the “all” segment, with active ombuds offices, from 01/01/2015 to 08/31/2025.

It should be highlighted at this point that, for methodological reasons, only the “complaints” option was analyzed, even though options for compliments, claims, “simplifique”, requests, and suggestions existed. They were not part of this study’s object, but they appear in the tables for the purpose of data comparison.

Next, data available on the CGU’s “Correção em Dados” dashboard were analyzed concerning the opening of administrative procedures and the imposition or not of sanctions. There, within the intended analysis period, the subject “conduct of sexual connotation” was selected, given that “sexual harassment” was not available. The “federal” sphere was selected in the “all” segment, from 01/01/2015 to 08/31/2025.

DISCUSSION: CONDUCT OF SEXUAL CONNOTATION AND SEXUAL HARASSMENT FROM THE PERSPECTIVE OF THE FEDERAL PUBLIC ADMINISTRATION

The concept of sexual harassment emerged from North American public debate in the 1970s, more precisely in the university context of Cornell University, where feminist activists named as sexual harassment the conduct of hierarchical superiors who used their position to make advances of sexual connotation toward subordinates (Silva, 2024). From the 1980s onward, the topic gained international visibility, being incorporated by feminist movements and international organizations as a relevant issue of women’s rights, especially in the world of work.

According to Barros (2009), legal interpretation of cases involving the violation of sexual dignity in institutional contexts must be guided centrally by the principle of human dignity so as to ensure effective and fair responses to victims. In this sense, rigorous mastery of these concepts strengthens the capacity of public and private institutions to act both in prevention and in confronting sexual-nature violence, in harmony with the constitutional principles of human dignity, equality, and non-discrimination.

In the Brazilian legal system—especially regarding possible disciplinary sanctions applied within the federal public administration—the distinction between conduct of sexual connotation and sexual harassment is fundamental, even though both share the same field of violation of sexual dignity. Although related, the concepts present essential differences regarding gravity, legal configuration, and consequences in the public sector.

Thus, it is important to highlight that the CGU’s Sectoral Plan for Combating Harassment (2024) defined sexual violence as a serious public health problem present in various contexts, including schools



and universities. Globally, the incidence of sexual violence is alarming, and this problem has already been recognized as a public health issue by the World Health Organization (2019).

In Brazilian doctrine—especially within Labor Law, Criminal Law, and the protection of fundamental rights—conduct of sexual connotation comprises any action, verbal or physical, that has explicit or implicit sexual character and provokes embarrassment, intimidation, humiliation, or violation of a person’s dignity, irrespective of physical contact. It is behavior that involves sexual content or meaning and may manifest through words, gestures, looks, touches, messages, or attitudes that refer to sexuality.

As Barros (2009) observes, such conduct may be inappropriate and offensive to the professional environment, but does not always, by itself, constitute the crime of sexual harassment. Thus, conduct of sexual connotation is the genus of which sexual harassment is a species. Accordingly, we have:

Conduct of Sexual Connotation	Sexual Harassment
Inappropriate behavior, without necessarily any intention to embarrass or obtain advantage.	Requires deliberate intent to obtain sexual advantage, generally with abuse of power/hierarchy.
Not every sexualized conduct is sexual harassment.	All sexual harassment involves conduct of sexual connotation, but not the reverse.
May, on its own, lead to disciplinary or administrative sanctions.	Is typified as a crime under art. 216-A of the Penal Code Subject to dismissal in the federal public administration.

Source: created by the authors

In the Brazilian context, the promulgation of Law No. 10,224 of May 15, 2001 included in the Penal Code article 216-A, which typifies sexual harassment as a crime, providing for detention for those who constrain another person with the aim of obtaining sexual favor, especially in relationships marked by hierarchy or subordination (also Bosco; Nogueira, 2001; Bradaschia, 2007; Moreira, 2016 apud Haile, 2021).

Sexual harassment comprises any conduct of a sexual nature that is not desired by the person who receives it, including, among other practices, physical contacts, insinuations, comments, or manifestations of sexual tenor. It is not required, for characterization, that the conduct be repeated or involve explicit physical or psychological violence. In certain situations, comments of sexual tenor, jokes, verbal threats aimed at obtaining sexual favors, as well as physical contacts or non-reciprocal and unwanted looks, may be legally framed as a crime, especially when capable of compromising the victim’s job security or of establishing a hostile, distressing, or intimidating work environment.



Moreover, for the configuration of harassment it is indispensable that the conduct be unwanted and persistent, to which the victim reacts by manifesting rejection of the harassing acts (Fonseca et al., 2021).

The aggressor may be any person, regardless of gender; this form of violence is frequently expressed through the abusive exercise of different modalities of power (hierarchical, gender-based, or economic) for the purpose of obtaining sexual advantages (Haile, 2021, apud Duarte, 2001, among others). It is a practice that violates the most intimate sphere of the individual and that, by affronting the principles of equality, privacy, and human dignity, constitutes a serious violation of human rights.

According to the CGU's Sectoral Plan for Combating Harassment (CGU, 2024), sexual harassment is characterized by adopting conduct with sexual content without consent, involving the undue use of position or office to obtain sexual advantages, or resulting in embarrassment and the violation of fundamental rights. In this context, essential legal interests are protected, such as the dignity, intimacy, privacy, honor, and sexual freedom of public servants, as well as users of the services offered by the public administration.

Thus, in light of doctrine, sexual harassment is classified into two main modalities:

- (i) sexual harassment by intimidation, also termed environmental harassment, which is characterized by the creation of a sexualized environment capable of producing a hostile and intimidating climate (ILO, 2019); and
- (ii) sexual harassment by blackmail, or *quid pro quo*, typical of work relationships marked by hierarchy, in which there is abuse of authority (ILO, 2019), the modality that includes the crime provided for in art. 216-A of the Penal Code. In both cases, the practice is deemed unlawful within the federal public service, subjecting the agent to applicable administrative sanctions, including dismissal, in accordance with legislation applicable to the Federal Public Administration.⁴

Sexual harassment by intimidation, also termed environmental, manifests in situations of dispute for professional space, in which the aggressor resorts to sexual harassment, and not moral harassment, when the victim occupies a position of greater vulnerability within the organization or social sphere, affecting, mostly, women and homosexual persons. In this modality, the existence of formal hierarchy is not an indispensable condition for occurrence, and practice among coworkers is common (ILO, 2011; Moraes; Múrias; Magalhães, 2014 apud Fonseca, 2021).

Violence is expressed, above all, in the limitation of the victim's freedom to refuse sexist advances, even if there are not necessarily direct punishments or immediate prejudice to the victim's

⁴ According to articles 117 and 132 of Law No. 8,112/1990, Binding Opinion No. 1/2023/PG-ASSEDIO/SUBCONSU/PGF/AGU, Opinion No. 0015/2023/CONSUNIAO/CGU/AGU.



position at work (Fonseca, 2021). Such conduct, however, may constitute an unlawful act in the civil, labor, and administrative spheres.

By contrast, sexual harassment by blackmail, also known as *quid pro quo*, is characterized by the crime and by the explicit presence of hierarchy and the exercise of authority in work relations. In these cases, the victim is placed before the threat of suffering prejudice in their professional, economic, or moral condition if they do not accept the advances or, inversely, of obtaining benefits and advantages if they agree to such demands, establishing a coercive and abusive relationship (ILO, 2011; Brito, 2011; Pierucci et al., 2014 apud Fonseca, 2021).

However, even when not constituting a criminal offense described in the Penal Code, behavior/conduct of sexual connotation suffered by a coworker, client, or subordinate is a real problem in the corporate environment, and is subject to punishment.⁵

This is because, within the Federal Public Administration, a broader and more systematic interpretation of sexual harassment is adopted, not limited to the strict definition provided in the Penal Code. This understanding arises from the need for reinforced protection of fundamental rights in the institutional environment, especially human dignity, equality, and administrative morality.

Thus, analysis of sexual harassment goes beyond mere penal/criminal typification, encompassing conduct that, although not constituting a crime, is incompatible with functional duties and with the values governing Public Administration.

In this line, Schwarz (2010) clarifies that the configuration of sexual harassment presupposes, concomitantly, the presence of embarrassment, abuse of power, and the specific purpose of obtaining advantage of a sexual nature. These elements are fundamental for distinguishing between inappropriate behavior of sexual connotation and sexual harassment proper, especially within the administrative-disciplinary field.

The principal distinction thus resides in the subjective element of the conduct, embodied in intent. While certain manifestations of sexual tenor may occur without the direct intention of obtaining sexual advantage, sexual harassment requires that the agent act consciously and directed toward that end, taking advantage of their position of functional or hierarchical superiority. In other words, although every situation of sexual harassment involves sexualized conduct, not every conduct of this nature will be sufficient, by itself, to characterize sexual harassment, especially when the specific purpose of obtaining sexual advantage is absent.

⁵ According to articles 117 and 132 of Law No. 8,112/1990, Binding Opinion No. 1/2023/PG-ASSEDIO/SUBCONSU/PGF/AGU, Opinion No. 0015/2023/CONSUNIAO/CGU/AGU; in both cases, it is considered unlawful within the federal public service and subject to dismissal, in view of the legal determinations applicable to the federal public administration.



Put differently, while every situation of sexual harassment involves conduct of sexual connotation, not all sexualized conduct will necessarily characterize sexual harassment.

In September 2023, the current President of the Republic approved Opinion No. 00015/2023/CONSUNIAO/CGU/AGU, making it binding and establishing dismissal as the penalty for cases of sexual harassment within the entire federal public administration, since Law No. 8,112/1990 did not expressly typify such conduct as functional misconduct, generating doubts regarding the penalty to be applied. According to the opinion, the concept of sexual harassment is:

The practice of sexual harassment, broadly understood as any conduct of a sexual nature manifested in the exercise of a public position, job, or function or by reason thereof, expressed through acts, words, messages, gestures, or other means, proposed or imposed upon persons against their will, regardless of gender, that causes embarrassment and violates their sexual freedom, intimacy, privacy, honor, and dignity, affronts administrative morality, decorum, the dignity of public office and of the institution, characterizing a disciplinary transgression of gravest nature. (Opinion No. 00001/2023/PG-ASSEDIO/SUBCONSUS/PGF/AGU)

As is evident, both the opinion and Law No. 14,612 of July 3, 2023 expressly adopted a broad/extensive definition of the expression sexual harassment, to include all conduct of sexual connotation offensive to another person's dignity and sexual freedom even without hierarchy between harasser and victim, provided that the agent's position is relevant to the practice of harassment.

For the configuration of sexual harassment before the federal public administration, it is necessary: (a) conduct of sexual connotation offensive to the dignity and sexual freedom of another person; (b) no need for hierarchy; (c) that the agent's position be a determining characteristic for occurrence; (d) without the specific purpose of obtaining sexual advantage.

So broad is the concept that, following the same reasoning line, in a training course offered by the CGU entitled "Correcional ABC of the Investigation of Harassment and Other Improper Conduct of Sexual Connotation," the lecturer Fabian Maia emphasized that other conduct typified in the Penal Code, depending on the circumstances, may be characterized, for the purpose of disciplinary penalty within the federal public administration, as sexual harassment, insofar as they are crimes against sexual dignity. Crimes of rape (art. 213, PC), sexual violence through fraud (art. 215, PC), sexual importuning (art. 215-A, PC), exposure of sexual intimacy (art. 216-B, PC), rape of a vulnerable person (art. 217-A, PC), and all types described in the chapter of sexual crimes against vulnerable persons (Title VI, Chapter II) can be considered sexual harassment for the federal public administration, subject to dismissal if committed in the public service by public agents/servants (Opinion No. 00001/2023/PG/ASSEDIO/SUBCONSUS/PGF-AGU).

The International Labour Organization (ILO), in turn, establishes that sexual harassment consists of behaviors such as insinuations, threats, non-consensual physical contacts, blackmail, or any form of

Humanities and Social Sciences: Research and Reflections



unwanted sexual solicitation that harms the victim's dignity—especially women—and creates a hostile work environment (Silva, 2024).

Haile (2021) also notes that sexual harassment can be expressed in various forms, from non-consensual touches to comments of sexual connotation, invasive looks, and unwanted physical contacts. The conduct does not require repetition to be considered criminal, as long as it creates a distressing work environment or threatens job stability. The author highlights, based on Duarte (2001), that the aggressor may be of any gender. The determining element is the use of hierarchy or functional influence to obtain advantage of a sexual nature.

In this scenario, both cases of sexual harassment and conduct of sexual connotation may constitute an affront to the constitutional principles of human dignity, equality, and protection of intimacy and private life, and also act as a limiting factor for the effective equality of opportunities in professional spheres. As Silva (2024) points out, the persistence of an institutional culture marked by silence and the naturalization of abusive practices remains one of the main obstacles to eradicating this type of violence, especially in the Latin American context, where academic debate on the topic still proves incipient in various countries.

Although the Brazilian legal system has advanced in recognizing and protecting victims of sexual harassment, its practical application reveals significant limits. Frequently, victims fail to report due to fear of reprisals, low confidence in institutional instances, or the lack of effective policies for reception, listening, and investigation. This reality shows that mere normative provision is insufficient, making it indispensable to promote an institutional culture oriented toward prevention, accountability, and care for affected persons.

Within public institutions—marked by hierarchical relations—sexual harassment may manifest subtly, institutionally, or symbolically. Its impacts go beyond the legal sphere, reaching dimensions such as victims' mental health, professional and academic performance, and, in many cases, the very permanence of these people in work and training spaces.

TRANSPARENCY AND INSTITUTIONAL VIOLENCE THROUGH TABULATED DATA

Given that the contours of sexual harassment in the federal public administration are not restricted to penal/criminal conceptualization and are far broader, it is also evident that combating abusive practices in public institutions has always required an articulated response on the part of those institutions and their management, involving effective instruments of control, accountability, and mechanisms to promote confrontation.

The difference is that now the general population has access to these data regarding federal public bodies—here specifically—making it possible to demand effective and transparent results.

Humanities and Social Sciences: Research and Reflections



In this context, the Office of the Comptroller General (CGU) plays a prominent role in the structure of the federal government, being responsible for fostering public integrity and supervising the correct application of public resources. It is a central body of the Executive Branch's internal control system, with fundamental attributions in preventing and combating irregularities and/or illegalities, promoting administrative ethics, and strengthening trust in public institutions (Santos, 2023).

The CGU was conceived to improve Brazil's internal oversight mechanisms, with special attention to corruption. Its creation dates back to 2001, when it was instituted as the Office of the Corregidor-General of the Union, being formally transformed into the CGU by Law No. 10,683/2003. Since then, it has broadened its scope of action, incorporating the functions of auditing, ombuds service, accountability, and promotion of transparency, reinforcing its strategic position in confronting corruption and in building a more transparent and efficient public administration (Santos, 2023).

Its principal attributions include: combating corruption; promoting transparency and social control; improving public management; strengthening the culture of integrity; and consolidating the principles of public administration—legality, impersonality, morality, publicity, and efficiency. In addition, the institution coordinates the Federal Government's Internal Control System, conducts audits, investigates denunciations of irregularities, applies sanctions provided for in the Anti-Corruption Law (Law No. 12,846/2013), and acts in training public servants (Santos, 2023).

Among the initiatives aimed at active transparency, the “Resolveu?” dashboard stands out—a digital platform created by the Office of the Ombudsman-General of the Union (OGU), linked to the CGU. The tool's main purpose is to systematize and publicize data concerning submissions recorded by citizens in the federal public administration's ombuds channels. Through it, one can access information related to complaints, claims, suggestions, and compliments, as well as consult indicators on resolution and response time by agency or entity (Souza et al., 2024).

In addition to its informative function, the “Resolveu?” dashboard also plays a strategic role in inducing administrative changes. By making public the resolution rates and response times of ombuds submissions, the tool tends to pressure public administration bodies to improve their internal investigation and response flows to society's demands. This visibility contributes to creating a culture of accountability and to valuing social control, promoting the engagement of managers, servants, and users in building more responsive institutions.

The data extracted from the platform can foster management more sensitive to institutional violence, serving as a basis for periodic evaluations of institutional performance and as a reference for developing specific integrity policies and strengthening the culture of combating abusive practices in the academic environment. Thus, we have:

Humanities and Social Sciences: Research and Reflections



Table 1 - Data Obtained from the “Resolueu?” Dashboard

There were 4,891,344 GENERAL SUBMISSIONS in 328 agencies of the Federal Executive Branch								
Sexual harassment	From 01/01/15 to 08/31/25							
	General submissions	Agencies	Under analysis/handling	Enabled/answered	Not enabled (archived)	Sent to other agencies	Resolution	Average satisfaction
	4.783	284	103	3834	846	335	73,15 %	50%
	2,633 general submissions, where applicable, were forwarded for opening of investigative or accusatory proceedings.							
There were 980,597 COMPLAINTS in 328 agencies of the Federal Executive Branch								
Sexual harassment	De 01/01/15 a 31/08/25							
	Complaints only	Agencies	Under analysis/handling	Enabled/answered	Not enabled (archived)	Sent to other agencies	Resolution	Average satisfaction
	4.546	284	93	3638	815	299	72,12 %	49,35%
	2,524 were forwarded, where applicable, for opening of investigative or accusatory proceedings.							

Source: created by the authors

Even when a complaint is classified as “enabled,” such classification does not automatically imply that its content is sufficient to initiate an administrative procedure for holding the accused accountable—be it through an inquiry or by initiating an Administrative Disciplinary Proceeding (PAD).

It is the responsibility of the Ombuds Unit to receive the complaint and conduct preliminary analysis. At this stage, it is essential to distinguish verifying the presence of minimum requirements for admissibility of the complaint (proper to the Ombuds Office) from investigating the truthfulness of the reported facts, which does not fall within its scope of action.

Thus, the limit of the Ombuds Office’s action in handling complaints received—including those related to sexual harassment—consists in, once the complaint is considered “enabled,” i.e., the existence of the minimum required elements confirmed, forwarding it to the agency’s or entity’s competent internal affairs unit for acknowledgment and adoption of appropriate measures.

The Internal Affairs Office (Corregedoria), in turn, upon receiving complaints previously considered “enabled” by the Ombuds Office, must conduct the admissibility judgment in accordance with the parameters established in art. 144 of Law No. 8,112/1990 and other applicable regulations (Thematic Report on Sexual Harassment, 2023).



It is important to highlight that this study presents the total number of complaints, and the data categorized as “Total (*)” in the tables include not only complaints but also claims, compliments, requests, and suggestions related to the topic. This indicates that not all submissions were exclusively accusations of harassment but may involve other forms of interaction by the academic community with institutional ombuds offices.

Furthermore, within the total occurrences, some are classified as “not enabled or archived,” as they are those that did not present minimum elements such as the names of those involved or details of the fact to be investigated, lack of clarity/insufficient data, duplicate submission, improper submission, or even lack of competence—facts that make the Ombuds Office’s action impossible.

Based on the data found, it was also deemed appropriate to carry out a comparative analysis between the entire period from 01/01/2015 to 08/31/2025 and the more recent period from 04/01/2023 to 08/31/2025. This comparison was made because in April 2023 the Program for the Prevention and Confrontation of Sexual Harassment and Other Crimes against Sexual Dignity and Sexual Violence in the public administration—direct and indirect—federal, state, district, and municipal was promulgated.

Table 2 - Data Obtained from the “Resolveu?” Dashboard

There were 2,056,979 GENERAL SUBMISSIONS in 328 agencies of the Federal Executive Branch								
Sexual harassment	From 04/01/23 to 08/31/25							
	General submissions	Agencies	Under analysis/handling	Enabled/answered	Not enabled (archived)	Sent to other agencies	Resolution	Average satisfaction
	2375	248	102	1772	502	160	63,66 %	41,92%
	1,110 general submissions, where applicable, were forwarded for opening of investigative or accusatory proceedings.							
Foram 980.597 DENÚNCIAS em 328 órgãos do Poder Executivo Federal								
Sexual harassment	From 04/01/23 to 08/31/25							
	Complaints only	Agencies	Under analysis/handling	Enabled/answered	Not enabled (archived)	Sent to other agencies	Resolution	Average satisfaction
	2287	246	92	1710	485	152	62,78 %	40,83%
	1,073 complaints, where applicable, were forwarded for opening of investigative or accusatory proceedings.							

Source: created by the authors



From analysis of the data, it is possible to perceive a concentration of complaints in the last two years (2023 to 2025), indicating increased awareness in the community and a possible improvement in mechanisms for institutional listening and recording, very likely due to Law No. 14,540/2023. This dashboard has played a fundamental role in promoting greater visibility of submissions recorded by ombuds offices (Souza et al., 2024).

However, this increase may also be linked to an alarming reality: abusive practices remain entrenched and, in some cases, intensified by impunity or the inefficiency of disciplinary structures. This hypothesis is reinforced by data from the “Correção em Dados” dashboard: less than half of the complaints resulted in the opening of administrative procedures, and only a small fraction of those procedures culminated in effective sanctions (Santos, 2023).

This institutional discrepancy can be explained, in part, by the absence of effective prevention and confrontation policies. International and regional literature recommends adopting clear protocols, structures for psychosocial support, training of servants, and safe and accessible channels for reporting. The experience of Latin American universities shows that well-implemented protocols are fundamental for mitigating such violence and promoting cultural transformations on campuses (Distintas Latitudes, 2023).

These data suggest three possible interpretations:

- (i) a real increase in occurrences, related to institutional or social factors;
- (ii) greater trust by victims in reporting channels, possibly related to awareness campaigns and strengthening of ombuds offices under Law No. 14,540/2023;
- (iii) improved transparency and systematization of records on the “Resolheu?” dashboard as of 2023.

Regardless of the cause, the numbers indicate the need to strengthen institutional mechanisms for reception, investigation, and accountability. The recent period highlights the importance of monitoring the efficiency of responses and ensuring that increased complaints are not accompanied by impunity or revictimization.

Next, data available from the CGU’s “Correção em Dados” dashboard were verified, as it broadens understanding of the institutional path of complaints within Public Administration. While the “Resolheu?” dashboard focuses on the initial stage of handling submissions presented to ombuds offices, demonstrating the volume, nature, and profile of demands received, the “Correção em Dados” dashboard makes it possible to observe the unfoldings of those submissions in the field of administrative accountability, by compiling information on the initiation, progress, and results of disciplinary administrative proceedings, as well as the application of sanctions to individuals and legal entities.



The combined use of these two databases enables a more comprehensive and integrated analysis of institutional confrontation of sexual harassment, not only allowing identification of the recording of complaints but also verification of the extent to which they progress to the internal affairs sphere and result in concrete accountability measures—which is fundamental for assessing the effectiveness of prevention, investigation, and sanction policies adopted by Public Administration. Thus, we have:

Table 3 - Data Obtained from the “Correção em Dados” Dashboard

230,002 administrative procedures initiated in the dashboard’s totality 15,702 accusatory disciplinary procedures concluded with the application of the sanction of warning 15,286 accusatory disciplinary procedures concluded with the application of the sanction of suspension 24,855 accusatory disciplinary procedures concluded with the application of the sanction of expulsion						
From 01/01/15 to 08/31/25 <u>2,950 administrative procedures were initiated on the subject:</u> Conduct of sexual connotation						
Conduct of sexual connotation	578 are still in progress (246 investigative procedures and 332 accusatory procedures) 2,372 were concluded (1,578 investigative procedures and 794 accusatory procedures)					
	<i>Of these 794 accusatory disciplinary procedures concluded, we have:</i>					
	Acquittal	TAC	Warning	Suspension	Expulsion	Prescription
	239	64	51	148	216	76
From 04/01/2023 to 08/31/25 <u>1,618 administrative procedures were initiated on the subject:</u> Conduct of sexual connotation						
Conduct of sexual connotation	431 are still in progress (280 investigative procedures and 151 accusatory procedures) 1,187 were concluded (991 investigative procedures and 196 accusatory procedures)					
	<i>Of these 196 accusatory disciplinary procedures concluded, we have:</i>					
	Acquittal	TAC	Warning	Suspension	Expulsion	Prescription
	14	58	16	39	67	2
There were 306 occurrences at Caixa Econômica Federal, ranking first						

Source: created by the authors

The data extracted from the “Correção em Dados” dashboard demonstrate the relevance of the topic within the Federal Public Administration and allow observation of the evolution of institutional handling of conduct of sexual connotation. In the broader time frame, one notes the initiation of 2,950 administrative procedures related to the topic, a significant portion of which are still in progress, while others have resulted in conclusive decisions—including acquittals, execution of Terms of Conduct Adjustment (TACs), and application of disciplinary sanctions ranging from warning and suspension to the maximum penalty of dismissal. These numbers show that conduct of sexual connotation has been the



subject of accountability attention, with effective mobilization of mechanisms for administrative responsibility.

Analyzing specifically the period from 2023 to 2025, as occurred with the data from the “Resolheu?” dashboard, one observes an expressive concentration of procedures initiated, totaling 1,618 records—a number representing a significant portion of the total identified. This increase may be associated, in relevant measure, with the promulgation of Law No. 14,540/2023, which instituted the National Program for the Prevention and Confrontation of Sexual Harassment and Other Crimes against Sexual Dignity and Sexual Violence; with awareness regarding confrontation and prevention of harassment; but also with an increase in harassment itself.

By establishing clear guidelines, institutional duties, and mechanisms for prevention, reception, and accountability, the new legislation tends to increase the visibility of the problem, strengthen victims’ confidence in institutional channels, and encourage formal recording of occurrences—directly impacting internal affairs indicators.

In this sense, the increase in the number of procedures in the period following the law’s entry into force should not be interpreted solely as an isolated rise in the incidence of conduct, but as a possible reflection of improved normative instruments, greater institutional awareness, and consolidation of a culture of confronting harassment in the federal public service. It is, therefore, a datum that reinforces the importance of structured public policies of prevention and combat, as well as of transparency and integrated action between ombuds offices and internal affairs units in the realization of fundamental rights to dignity, equality, and safe work environments.

These data reinforce the importance that the transparency provided by platforms such as the “Resolheu?” dashboard and the “Correição em Dados” dashboard be not only informative but mobilizing of structural institutional changes, ensuring victims of harassment a fair, swift response based on due process of law. The mere existence of reporting channels is not sufficient if there is no structure and political will to guarantee accountability of aggressors and symbolic and institutional reparation to victims.

FINAL CONSIDERATIONS

Protection of life and human dignity must occupy a central position in social and institutional relations; the naturalization of suffering, violence, or injustice is no longer admissible. Confronting harassment is a structuring challenge for building a new organizational and social culture, requiring a conscious, collective, and responsible choice. Facing the problem directly, recognizing its gravity, and assuming effective commitments to prevention and accountability is an indispensable condition for consolidating a truly democratic society that is safe and healthy for all people.



In this sense, the precise distinction between conduct of sexual connotation and sexual harassment proves fundamental not only for the correct legal qualification of facts but also for promoting institutional environments guided by respect and the protection of human dignity. Educational and work institutions must implement clear and effective policies capable of recognizing and confronting the gravity of behavior of a sexual nature that violates respect for persons, irrespective of its subsequent legal classification, reaffirming the commitment to dignity, equality, and integrity of all subjects.

The “Resolveu?” and “Correção em Dados” dashboards are consolidating as instruments for evaluation and encouragement of accountability, promoting an institutional environment that is safer, more democratic, and committed to respect for human rights, with responses to rights violations and enabling improvement of public policies in the public environment.

The importance of the platforms is also reflected in the possibility of comparing institutions’ performance regarding response to complaints and the forwarding and application of sanctions, encouraging agencies to improve channels for reception and conflict resolution, and allowing a more accurate diagnosis concerning the effectiveness of actions adopted.

Recommendations extracted from analyzed studies point to the urgency of adopting an integrated institutional policy that involves not only reactive measures but, above all, preventive and educational actions. The CGU, as an oversight and transparency body, must be strengthened as a strategic partner in building academic environments that are safe, upright, and welcoming (Santos, 2023).

Sexual harassment tends to perpetuate itself and, often, to remain invisible not because of explicit manifestations of violence, but precisely because it is expressed through subtle, everyday, and symbolic practices that are socially tolerated or minimized. This veiled form of violence contributes to the normalization of injustice and to difficulty in institutional recognition of the problem, allowing harassment situations to extend over time in victims’ trajectories—often without finding reception, protection, or adequate assistance in the face of the violations suffered.

Given this scenario, institutional incorporation of strategies to confront sexual harassment proves indispensable. When prevention is assumed as a priority by institutions—especially universities and other spaces of training and work—an environment conducive to implementing educational programs aimed at understanding the dynamics and characteristics of this form of violence is created. Such initiatives contribute not only to promoting prevention and social justice but also to strengthening mechanisms for holding aggressors accountable, reaffirming institutional commitment to dignity, equality, and the safety of individuals.



REFERENCES

1. Barreto, Margarida Maria Silveira. *Violência, saúde e trabalho: uma jornada de humilhações* [Violence, health and work: a journey of humiliations]. São Paulo: EDUC, 2003.
2. Barros, Alice Monteiro de. *Curso de direito do trabalho* [Labor law course]. 5. ed. São Paulo: LTr, 2009.
3. Brasil. Lei nº 14.504, de 03 de abril de 2023 [Law No. 14,504, of April 3, 2023]. Institui o Programa de Prevenção e Enfrentamento ao Assédio Sexual e aos Demais Crimes contra a Dignidade Sexual e à Violência Sexual [Establishes the Program for the Prevention and Combating of Sexual Harassment and Other Crimes against Sexual Dignity and Sexual Violence]. *Diário Oficial da União*, Brasília, DF, 3 Apr. 2023.
4. Brasil. Lei nº 8.112, de 11 de dezembro de 1990 [Law No. 8,112, of December 11, 1990]. Dispõe sobre o regime jurídico dos servidores públicos civis da União, das autarquias e das fundações públicas federais [Provides for the legal regime of federal civil servants, autarchies and federal public foundations]. *Diário Oficial da União*, Brasília, DF, 12 Dec. 1990.
5. Controladoria-Geral da União (CGU). *Painel Correição em Dados* [Disciplinary Data Panel]. Brasília, DF: CGU. Available at: <https://www.gov.br/cgu>. Accessed on: 10 Aug. 2025.
6. Controladoria-Geral da União (CGU). *Painel Resolveu?* [“Resolved?” Panel]. Brasília, DF: CGU. Available at: <https://www.gov.br/cgu>. Accessed on: 10 Aug. 2025.
7. Controladoria-Geral da União (CGU). *Plano setorial de combate aos assédios* [Sectoral plan to combat harassment]. Brasília, DF: CGU, 2024.
8. Controladoria-Geral da União (CGU). *Relatório temático sobre assédio sexual* [Thematic report on sexual harassment]. Brasília, DF: CGU, 2023.
9. Fonseca, Dielly Débora Farias; Mattos, Carlos André Corrêa de; Corrêa, Alessandro de Castro. *Assédio moral e sexual no serviço público: características e reflexos nos pedidos de remoção em uma instituição de ensino superior da região norte do Brasil* [Moral and sexual harassment in the public service: characteristics and effects on transfer requests in a northern Brazil higher education institution]. *Revista GUAL*, Florianópolis, v. 14, n. 3, p. 68–90, set./dez. 2021. Available at: <http://www.gual.ufsc.br>. Accessed on: 31 Jul. 2025.
10. Freitas, Acimarney Correia Silva; Pin, José Claudio Del. *Assédio moral pedagógico como expressão do autoritarismo em sala de aula: percepções de estudantes de engenharia* [Pedagogical moral harassment as an expression of classroom authoritarianism: perceptions of engineering students]. *Educação*, Santa Maria, v. 48, 2023. Available at: <https://periodicos.ufsm.br/reveducao>. DOI: 10.5902/19846444x68518.
11. Freitas, Maria Ester de; Heloani, Roberto; Barreto, Margarida. *Assédio moral no trabalho* [Moral harassment at work]. São Paulo: Cengage Learning, 2008.
12. Haile, Vanessa de Oliveira. *Assédio e o abuso no ensino superior: das agressões à omissão institucional* [Harassment and abuse in higher education: from aggression to institutional omission]. *Revista Brasileira de Educação em Geografia*, Campinas, v. 11, n. 21, p. 5–24, jan./dez. 2021.



13. Hirigoyen, Marie-France. Assédio moral: a violência perversa no cotidiano [Moral harassment: perverse violence in everyday life]. 12. ed. Rio de Janeiro: Bertrand Brasil, 2011.
14. JBI. Joanna Briggs Institute Reviewers' Manual: 2014 Edition. Adelaide: The Joanna Briggs Institute, 2014.
15. Maito, D. C.; Panúncio-Pinto, M. P.; Vieira, E. M. Violência interpessoal no ambiente acadêmico: percepções de uma comunidade universitária [Interpersonal violence in the academic environment: perceptions of a university community]. *Interface (Botucatu)*, v. 26, e220105, 2022. Available at: <https://doi.org/10.1590/interface.220105>. Accessed on: 31 Jul. 2025.
16. Silva, Sílvia Maria Pereira da; Araujo, Ana Cristina Gonçalves Dantas de; Andrade, Cristiane Batista. "Isso custou a minha saúde": o assédio sexual no ensino superior a partir da análise da página #MeuProfessorAbusador ["It cost me my health": sexual harassment in higher education based on the analysis of the page #MeuProfessorAbusador]. *Interface (Botucatu)*, v. 28, e240182, 2024. Available at: <https://doi.org/10.1590/interface.240182>. Accessed on: 31 Jul. 2025.
17. Souza, Cristhiane Santana de; Alexandre, João Welliandre Carneiro; Silva, Juliana Vitória Vieira Mattiello da. Um estudo sobre o assédio moral na percepção dos profissionais técnicos da educação superior (PTES) da Universidade do Estado de Mato Grosso (UNEMAT) [A study on moral harassment from the perception of technical professionals in higher education (PTES) at the State University of Mato Grosso (UNEMAT)]. *Educação em Debate, Fortaleza*, v. 44, n. 89, set./dez. 2022. ISSN 0102-1117. e-ISSN 2526-0847.
18. Souza, J. G.; Roso, A. R.; Moraes, M. E. F. Violência sexual na universidade: experiências e práticas de profissionais da Psicologia [Sexual violence at the university: experiences and practices of Psychology professionals]. *Revista Psicologia, Diversidade e Saúde*, v. 11, n. 1, 2024. Available at: <https://doi.org/10.17267/2317-3394rps.2022.e4195>. Accessed on: 10 Apr. 2025.