

Journal of Law & Social Studies (JLSS)

Volume 8, Issue 1, pp 132-146

[www.advancelrf.org](http://www.advancelrf.org)

## Criminalizing Harassment Against Men in Pakistan: A Critique in Light of International Best Practice

**Muhammad Arif Saeed**

Ph.D Law Scholar, Department of Law, The Islamia University of Bahawalpur, Pakistan

Email: [arif.saeed@iub.edu.pk](mailto:arif.saeed@iub.edu.pk)

**Dr. Muhammad Hassan**

**(Corresponding Author)**

Lecturer, Department of Law, The Islamia University of Bahawalpur, Pakistan

Email: [Muhammad.hassan@iub.edu.pk](mailto:Muhammad.hassan@iub.edu.pk)

### Abstract

*The issue of workplace harassment is often perceived as predominantly affecting women, resulting in the under-representation of male victims in legal and institutional contexts. This research addresses this disparity by offering a comparative analysis of legal frameworks regarding workplace harassment across Western nations (United States, United Kingdom, Canada), South Asian countries (Nepal, Maldives, Bhutan), and Islamic regions (Saudi Arabia, United Arab Emirates), ultimately suggesting a gender-neutral legal structure suitable for Pakistan. The study employs a qualitative methodology based on doctrinal analysis of statutes, case law, and secondary materials, alongside a review of existing literature concerning the victimization of males. Findings indicate that Western nations have adopted laws that are progressive and sensitive to women's issues, while South Asian countries are gradually working towards more neutral legislation despite prevailing social customs, and Islamic nations are incorporating Sharia principles concerning dignity and justice into the current standards of the workplace. The analysis concludes that Islamic jurisprudence does not endorse the concept of harassment for any gender, which could provide a foundational basis for reforms in Pakistan. It advocates for the establishment of comprehensive legal language, institutional mechanisms that are responsive to trauma, as well as clear employer liabilities and inclusive protections in the workplace. This goes beyond mere legal reforms; it also encompasses efforts to challenge the cultural stigmas faced by male victims who wish to pursue claims within institutional frameworks.*

**Keywords:** Workplace Harassment, Legal Framework, Psychological Abuse, Legal Protection for Men, International comparison.

### 1. Introduction

Workplace harassment is a growing issue that affects individuals across all genders. While much of the world's legislation focuses only on protecting women, it is important to recognize that men are also susceptible to harassment in a professional setting (Hodgins et al., 2024). Gender stereotypes and patriarchal cultural norms produce reporting inefficiency and insufficient responses toward male workplace harassment because vulnerability is socially linked to weakness. Men who are victims of harassment generally receive no understanding or legal protection from society, even though women have increasing support in these matters (The social failure to see harassment victims who are male establishes the necessity for laws that handle the distinct problems men encounter when seeking help for these experiences (Martins et al., 2023). Inadequate recognition prevents the development of safe workplaces that value the dignity of every employee (Saloni, 2021). The cross-regional analysis of the study provides both exemplary approaches and shared weaknesses that Pakistan can use to develop fair workplace policies (Hashmi, 2025). Resultantly, the primary purpose of this research paper is to critically examine the legal frameworks around the world addressing workplace

harassment against men, particularly in Western, South Asian, and Islamic countries. It is divided into four sections, first examining the laws of Western countries (United States, United Kingdom and Canada), secondly it has taken into consideration the laws of South Asian Countries (India, Bangladesh and Sri Lanka). Thirdly it has scrutinized the laws of Islamic Countries (Iran, Egypt and Saudi Arabia) and lastly it has extracted the insights from the laws of the respective countries to develop a strong legal framework for protection of workplace harassment against men in Pakistan.

## 2. Literature Review

The issue of workplace harassment has gained considerable international attention over the past few decades, leading many countries to implement legislation aimed at creating safe and respectful work environments. While much of the emphasis has been on safeguarding women due to the greater prevalence of such harassment against them, an increasing number of countries are recognizing that men can also be victims (Türkkan & Odacı, 2024; Nazareno et al., 2022). The strategies employed by Western, South Asian, and Islamic nations provide important insights for developing effective, inclusive, and enforceable laws that uphold human dignity and advance workplace justice for everyone, including men. The literature highlighted that beginning with Western nations, a notable example is the United States, where Title VII of the Civil Rights Act of 1964 has consistently functioned as a robust and gender-neutral framework for tackling workplace discrimination and harassment (Koch, 2025).

The statistics for male harassment at the workplace show significant differences in countries, with global averages reporting that about 17.1% of men are sexually harassed (Begeny et al., 2023), while 17.9% are psychologically and physically harassed at higher rates (Bhardwaj & Agrawal, 2022). In the US, complaints made by men have increased significantly over the last 20 years (McKenzie et al., 2022), although stigma still proves to hinder reporting. In the UK and Canada, about 12% and 10% of men respectively record being sexually harassed (Hammond, Ioannou & Fewster, 2017), although underreporting is still an issue due to societal beliefs (Mathura & Khan, 2026). The UAE, which has equally treating legal frameworks for men and women in harassment cases, continues to experience societal stigmas that discourage reporting, with about 8.5% of men reporting physical harassment or violence (Alhassan et al., 2025). Nepal exhibits high figures with about 43% of men reporting being sexually harassed (Neupane & Willey-Sthapit, 2025), especially when it comes to vulnerable industries like banking, which shows lack of awareness and satisfaction with the job as factors leading to such high statistics (Shrestha & Adhikari, 2025). Shifting focus to South Asia, while the region is still progressing in its approach to gender-neutral legislation, countries like Nepal and the Maldives have made commendable progress by explicitly criminalizing workplace harassment without associating it with a specific gender.

Grounded in Islamic principles of Justice and human dignity, these laws emphasize that harassment of any kind is morally and legally unacceptable. Moreover, the UAE has also made reforms in its labor laws, such as the Federal Decree Law 2021 clearly defines workplace harassment by imposing responsibility on employers to take preventive steps to create a safe and ethical working environment (Izelmaden, 2024). While Saudi Arabia implemented the Anti-harassment laws 2018 criminalizing workplace harassment against both men and women (Polok, 2024).

A major insight drawn from studying various legal frameworks is that there is a need for gender inclusive legal language. If the laws protect only one gender it may inadvertently exclude others resulting in harmful stereotypes. Another important insight is that establishing independent, accessible and accountable institutions for handling workplace harassment cases provides structured and confidential forums for redress. It is most important to understand that harassment can have severe psychological and professional consequences for men just like it does for women which can affect workplace morals, productivity and retention.

### 3. Methodology

#### 3.1 Research Design

The paradigm of research design of this study involves qualitative and doctrinal research design and has a comparative legal analysis paradigm. It centres on critically focusing on legal systems in diverse jurisdictions, backed by lessons that Islamic jurisprudence provides.

#### 3.2 Data Sources

**Primary Sources:** These documents were considered between legislation, provisions of the Constitution, international conventions, and judicial and administrative sources to define the formal legal action that could help male victims of harassment at the workplace.

**Secondary Sources:** Reviewed are secondary sources in the form of scholarly articles, legal commentaries, institutional reports and empirical studies that aimed to evaluate the real-world realities, societal/social acceptance, and institutional issues of existing laws. In addition, the statistical materials concerning male harassment claims were sourced in reliable national and international websites to base its analysis in the empirical evidence.

#### 3.3 Analytical Framework

A comparative legal analysis has been utilised to establish the best practises, the loopholes in the legislation and enforcement challenges in various states. The Islam jurisprudence aspect was included by interpretation of Quran verses, Hadith and juristic principle in order to assess the role of hitting workplace and its approach by Islamic law.

#### 3.4 Scope and Rationale

The intended scope of the research is the Western, South Asian, and the Islamic law systems that are aimed to give a deep insight into the laws on workplace harassment. The justification of its practise is to reveal the loopholes within the Pakistani legal system and suggest a more gender oriented and culturally situated model of dealing with workplace harassment in the provisions of male employees.

### 4. Results

Harassment at the workplace means unwanted behavior that affects a person's ability to work properly or makes the workplace uncomfortable, threatening, or offensive through touching, words, gestures, or showing inappropriate content, leading to serious problems like losing a job, respect, social standing, and sometimes even life (Paula, 2011). When an individual thinks about harassment in the workplace, they immediately think that a male worker harasses a female worker, but it is not the case every time, and it is negatively portrayed (Hashmat, 2023). Men and women are meant to have equal rights and protection; harassment has nothing to do with gender, it's about the person who is in power. The social norms often make it difficult for men to report harassment (Bhardwaj & Agrawal, 2022). From a young age, men are taught to be strong and not show vulnerability (Salon, 2021). This mindset leads many men to ignore or not recognize when they are being harassed, even when they do realize it, fear of being judged, mocked, or not believed stops them from speaking up (Ishita & Pragati, 2024). Recognizing this, many jurisdictions in the world, including Western, South Asian, and Islamic Countries, have made laws that are gender neutral to protect men from harassment of any nature at the workplace (Einarsen & Raknes, 1997).

#### 4.1 Laws Protecting Men from Harassment at the Workplace in the United States

In the United States the Title VII of the Civil Rights Act of 1964 is a notable piece of legislation at the federal level that prohibits discrimination in the workplace against individuals based on race, color, and sex, etc. Its scope has gradually expanded through judicial interpretation and administrative enforcement to encompass a wide range of employment-related misconduct, including sexual harassment (Gilan, 2014). It offers protections not only to women but also to an employee who faces harassment at the workplace, whether from an individual of the opposite sex or the same sex. One of the most notable cases of the US is *Oncale v. Sundowner Offshore Services Inc.* 1998 in which the

complainant, Joseph, was sexually harassed by a male co-worker while working on an oil rig. The supreme court unanimously held that the harassment by same-sex could also be actionable under the Title VII of the Civil Rights Act of 1964. This decision was important in establishing that protection in the Act against sex-based discrimination is not confined to female harassed by male but also includes the men who are subjected to unwanted, offensive and hostile conduct based environment based on their sex (*Oncale v. Sundowner Offshore Services*)

Workplace harassment becomes a violation under Title VII if it turns into either severe or widespread abuse that creates hostility in the work environment, or if one must tolerate these actions to maintain continued employment, this second form is called quid pro quo harassment (Dua, 2009). The Male staff members of the companies can file their claims EEOC regarding their grievances about masculinity or discrimination based on their sex, which can result in federal court litigation if required. Any person who files a harassment complaint cannot face any sort of retaliation, as they are protected under federal law (USEEOC, 2024). Any male employee who is suffering from continuous and repeated unwelcome jokes at the workplace regarding his looks or sexuality, or physical strength from his colleagues, whether male or female, can file a complaint against such practices under Title VII (Prado et al., 2021). The EEOC has the first and foremost duty to enforce Title VII through investigations, actions, and mediation services alongside legal proceedings against discrimination and harassment with strong evidence (Stephanie et al., 2024). The *Bostock v. Clayton County 2020* Supreme Court ruled that Title VII prohibits sex-based discrimination against workers. After this case the sex discrimination clause reaches sexual orientation and gender identity discrimination the protection scope for male employees significantly expanded. Employed males who experience discrimination because of their sexual orientation or their identification as gay, bisexual or transgender or their failure to respect gender norms receive Title VII protections (*Bostock v. Clayton County*) Title VII transformed into an extensive framework to shield employees from both gender-based harassment and discrimination based on their sexual orientation.

#### **4.2 Laws Protecting Men Against Workplace Harassment in United Kingdom**

Harassment against men is prevailing issue in United Kingdom. According to research and surveys conducted by organizations such as Trades Union Congress and Advisory, Conciliation and Arbitration Services reveal that a significant number of men in workplace experience inappropriate behavior (TUC.Org, 2022). The United Kingdom adopts a comprehensive and gender neutral approach to workplace harassment through the Equality Act 2010 a central piece of legislation for addressing discrimination. The Act consolidates previous-anti discrimination laws, providing protection against unfair treatment on the basis of specific characteristics including sex, sexual orientation, gender e.t.c. One of the most progressive features of the Equality Act is the gender neutral language ensuring that both men and women are equally protected under its provisions. Section 26 of the Act defined harassment as an unwanted conduct that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. This means that a man who is subjected to inappropriate sexual advances, jokes, and derogatory remarks related to gender is entitled to legal protection and may pursue a claim before an Employment Tribunal (Nicolle, 1991-1992).

The gender-neutral definition of the Equality Act protects male victims of harassment from legal uncertainty so they can seek legal protections on an equal basis with female victims. The companies shall receive employment harassment prevention guidelines from the Equality and Human Rights Commission through their Code of Practice on Employment, which supports existing legal protections (Susan, 2008). Moreover, recent developments in law, such as the Worker Protection Act 2024, have strengthened employer Obligations. In order to fulfill their obligations and reduce the liability, the business organizations should establish strong policies against harassment, conduct regular training sessions, and ensure confidential means for filing complaints (Jones, 2018).

### 4.3 Laws Protecting Men against Harassment at the Workplace in Canada

Canada has a combination of federal and provincial human rights laws, occupational health and safety legislation and labor standards addressing workplace harassment by adopting a gender-neutral approach. While historically much of the laws regarding workplace harassment focused on the experiences of women but Canadian laws explicitly covers all the genders ensuring that men are also susceptible to workplace harassment and is entitled to equal protection like women (Jones, 2018). The Canada Labour Code operates as the main federal law prohibiting harassment cases within banking and telecommunications sectors and transportation industries. The Government of Canada has made various amendments to the code to create strong workplace rules against harassment and violence and related forms including sexual harassment. Moreover, at federal level the Canadian Human Rights Act prohibits harassment in employment based on 13 prohibited grounds including gender which is an important element in harassment cases. The men who is an employee have two forums to file complaint against harassment committed to him by co-workers or supervisors or clients. Firstly, they can submit an internal complaint or submit their grievance to human rights commissions within their provincial or federal jurisdiction. Workplace harassment demands much attention from employers in under provisions within the Occupational Health and Safety Act in Ontario. The Ontario government provides the definition of harassment as to encompass vexatious conduct or comments made against workers whose nature would make the behavior unwelcome to them (Lanthier et al., 2018).

### 4.4 South Asian Countries

#### 4.4.1 Nepal's Approach Regarding the Protection of Men from Workplace Harassment

Nepal has emerged as one of the prominent South Asian country that have legally recognized and addressed the issue of harassment against men at workplace in a gender neutral manner (ILO, 2004). Like other regions in South Asia who have made their laws exclusively for protecting women, Nepal's legal framework is designed to protect women as well as men acknowledging that the harassment is not confined to one gender and men too can be a victims of abuse and misconduct at workplace (Rahama & Jahan, 2015). This approach is being adopted by the enactment of Sexual Harassment Prevention Act 2015 marking a significant step towards ensuring that all the employees in the workplace are entitled to equal protection in their professional environment, dignity and safety regardless of their gender. Most importantly when talking about the victim and accused the act follow gender neutral language including both men and women to seek remedy without any sort of bias and discrimination (Bakhadyo, 2025). It provides a mechanism for the employees including men to file a complaints against harassment either internally within the organization or externally through the prescribed forums.

Under the following Act, every business organization is required to establish a Complaints Handling Mechanism, including a committee or a designated officer responsible for receiving and investigating complaints of harassment. This structure is a major step in ensuring that male victims are not left without remedy because of their gender. Before the enactment of the Sexual Harassment Prevention Act the Muluki Criminal Code 2074 Section 224 dealt with Sexual Harassment (Rajbhandary & Shrestha, 2024). But the Sexual Harassment Act did not prevent the aggrieved person from initiating legal action under the Mulki Criminal Code. Nepal's legal landscape is also supported by its constitutional commitment to equality and dignity. Article 18 of Nepal's Constitution guarantees the right to equality and prohibits discrimination based on gender (Verma, 2025). Article 16 ensures the right to live with dignity. These provision provides a constitutional basis for the protection of men against workplace harassment and reinforce the legislative intent of the Act 2015.

#### 4.4.2 Maldives's Approach Regarding the Protection of Men from Workplace Harassment

Workplace harassment in the Maldives received much attention because of its a gender-neutral legal approach as compare to many South Asian countries who have exclusive approach particularly protecting women (Leeza & Kumar, 2023). The main law dealing with workplace harassment and

abuse is the Sexual Harassment and Abuse Prevention Act 2014 enacted to suppress the increasing harassment including those found in workplaces. The essential feature of sexual harassment policy in the Maldives is that it recognizes that victims of harassment includes both males and females enabling male victims to report offenses and obtain justice. The law uses gender-neutral terminology through “victim” and “perpetrator” to recognize both male and female workers at risk of harassment (Rahman, Wahid & Chaudhary, 2023). Male victims will have the right to approach the platforms through such committees to file complaints and have an access to various protective measures making offenders accountable through disciplinary actions and compensations and job terminations. The country established gender-neutral harassment policies to be applied to everyone no matter what their gender is (Sexual Harassment and Abuse Prevention Act, 2014; Waidler, Sunny & Rees, 2021).

## 4.5 Islamic Countries

### 4.5.1 Saudi Arabia’s Approach Towards Workplace Harassment Against Men

Saudi Arabia has made several significant legal changes over past few years particularly relating to labor rights and workplace regulations. The laws recognizes men as potential victim and protect him from workplace harassment, marking a progressive and significant shift in its legal landscape (Khoja, 2020). The most important milestone of Saudi Arabia protection against workplace harassment is the Anti-harassment Law 2018 and workplace Anti-Harassment Regulations 2019 defining harassment in broad terms as “ any statement, act or gesture of a sexual nature made by a person that affects another person’s body honor or modesty, by any means including modern technology (Saram, Hasan & Aburumman, 2024).

This law is gender-neutral in its language and applies equally to both men and women thereby ensuring the men who experience harassment in the workplace have legal basis to seek remedy and the law is applicable to all sectors including public and private employment, requiring necessary penalties for those found guilty of harassment ranging from imprisonment up to two years and a fine of SAR 100,000 with harsher penalties in aggravated circumstances (Khoja & Thomas, 2022).

Along with these the Saudi Arabia Labor Law amended in 2021 reinforces the principles of equality and dignity at work. Article 3 of the Labor Law explicitly states that all Saudi and Non-Saudi Workers are equal in terms of rights and obligations without any discrimination including discrimination based on gender (Musharbash, 2025). It imposes duties on the employers to provide a safe and respectful working environment. The Saudi Arabia’s approach to inclusive harassment regulations promotes workforce expansion and modern legal system evolution.

### 4.5.2 UAE Approach Towards Protecting Men from Workplace Harassment

In the midst of the rise of Islamic conservatism, the United Arab Emirates has successfully emerged itself as a progressive leader in terms of its comprehensive, gender neutral legislation to safeguard the dignity and rights of workers in the working place, including men (Khoja & Thomas, 2022). Yet the UAE’s more recent legal reforms, however, provide a more expansive notion of workplace safety (Alhassan et al., 2025), in that harassment is perceived to be a degradation of human dignity, regardless of whether the victim is a man or a woman. Accordingly, the UAE has taken strong legal measures which are well clear and safeguard against harassment of employee, male or female, at work. The Federal Decree Law 2021 regulating labour Relations and was in effect from February 2022 is a critical legislative milestone in this evolution (Wagner & Mallet, 2024).

The older 1980 Labour Law was replaced by this law with substantial reforms of course to bring them in tune with international labor standards (AL-Mustafa & Mohammad, 2025). For example, Article 14 of the law expressly states that employers shall not exercise any form of violence, harassment, or other physical, verbal, sexual, or psychological contempt against their employees against the basis they may be of any gender, race, color or religion or nationality ((Alhassan et al., 2025). In addition, Article 413 of the UAE Penal Code criminalizes sexual harassment, which is broadly defined as a repeated unwanted imposition of sexual attention, through words or actions, of a sexual nature (Al

Nuaimi, Alkrisheh & Al-Tkhayneh, 2023). These provisions reflect the UAE being a serious country for resolving not only issues related to physical harassment but also to harassment based on gender.

#### 4.5.3 Islamic Law About Workplace Harassment

Islamic Law derived from the Quran and Sunnah of the Holy Prophet (PBUH) and the interpretation of Islamic Jurists, emphasizing the value of dignity, Respect, Justice and Protection of Human honor. Although Classical Islamic Jurisprudence does not contain codified statutes specific to the modern workplace environment (Mohamed & Baig, 2014) However, its principles strongly condemn any form of behavior that comprises an individual's integrity, safety or modesty. Islamic teachings on anti-harassment Workplace harassment including both verbal and sexual abuse, intimidation and physical misconduct, is considered a violation of both moral and legal duties in Islam, whether victim is male or female. The Quran explicitly commands believers to "Lower their gaze and guard their Modesty" instructing both men and women to uphold respectful conduct in their interactions. (Surah Al-Nur Verse 30).

The Holy Prophet PBUH also strongly condemned any actions that cause harm to another. The Holy Prophet PBUH said that "Modesty is a Branch of Faith" and "The Muslim is the one from whose tongue and hand the people are safe, and the Believer is the one from whom the people's lives and wealth are safe (Sunan an Nasai 4995). These Hadith form the basis for Islamic legal principle "la darar wa la dirar" which prohibits harm in any form, including emotional, psychological or physical including workplace harassment. Islam prohibits all harassment and bullying, as Allah's Messenger said, "Anybody who believes in Allah and the Last Day should not harm his neighbour, and anybody who believes in Allah" (Sahih Bukhari: 6018). In another instance, the Prophet PBUH said: "The best of companions in God's sight is the one who is best to his companion, and the best of neighbour in God's sight is the one who is best towards his neighbor" (Sahih Bukhari: 6018)

Islamic Law also upholds the principle of accountability and justice (adl) Any action that humiliates or exploits another person is considered sinful and punishable in Islamic legal framework. Further, Islamic Law places a high value on maintaining a safe and ethical environment. Employers have a responsibility to protect their employees from harm and to ensure that workplace policies reflect Islamic standards (Ghani, Hussain & Abdi, 2024).

Harassment in the workplace disrupts harmony, violates trust and goes against the collective obligations of preserving public welfare (Maslahah). Bullying and harassing others at the workplace is offensive and will lead the perpetrator to hell (Van Fleet & Van Fleet, 2022) (hence allowing the Government to take action against such a person, especially when they are violating the rights of others).

**Table 1. Global Statistics On Male Workplace Harassment**

Country	% of Men Reporting Sexual Harassment	% of Men Reporting Any Harassment	Notable Findings / Context
United States	14–16% of sexual harassment complaints filed by men	17.9% psychological harassment (combined data)	Complaints by men have doubled over 20 years; stigma leads to underreporting(Grey, D, 2022).
United Kingdom	12% of men reported sexual harassment at work	-	Legal protections are gender-neutral; underreporting remains a challenge.
Canada	10% of men reported sexual harassment	-	Laws apply equally to men; reporting rates remain lower than for women.

UAE	Data not specified	8.5% reported physical violence/harassment	New laws protect men; cultural stigma still hinders reporting (Amir, S. A., & Dajani, H, 2019)
Nepal	43% of men reported sexual harassment	Mental harassment most common in banks	High rates in vulnerable sectors; job satisfaction affected by lack of awareness (Neupane, N, 2023).
Global	6% experienced sexual harassment (combined)	17.9% psychological; 8.5% physical (combined)	Most victims face repeated incidents; women more affected, but men also significantly impacted.

#### 4.5.4 Comparison of Legal Systems

Workplace harassment is an issue that has attracted much international attention in the last couple of decades prompting several countries to enact laws that are meant to establish safe and respectable working conditions (Einarsen & Raknes, 1997). Although a significant part of the focus has been on the protection of women because the latter are more prone to such harassment, more and more countries are acknowledging that men are also vulnerable (Saloni, 2021).

##### 4.5.4.1 Western Legal Frameworks

Title VII of the Civil Rights Act of 1964 in the United States has always served as a strong and gender-neutral tool towards addressing workplace discrimination and harassment (Gilani, 2014). This law is not limited to a single sex and recognizes that harassment can be in same gender and sexes. The case *Oncale v. Sundowner Offshore Services Inc.* (1998) was a landmark case since it declared that same-sex harassment is a subject of action under Title VII. The Equality Act 2010 has become a powerful legislative instrument in the United Kingdom which prohibits any discrimination and harassment on the basis of sex, sexual orientation and gender reassignment (Equality Act 2010, UK). Section 26 of the Act describes harassment as unwanted behavior that is against the dignity of a person or an intimidating, hostile, degrading or offensive environment (Hamerton, 2025). The UK approach is characterized by a special emphasis on the proactive employer responsibility (Policy, 2022).

Canada offers a subtle approach by its Human Rights Act on federal and provincial levels (Canadian Human Rights Act, R.S.C. 1985). These laws are gender-neutral and they focus on eliminating all forms of harassment such as psychological, physical and sexual. The model in Canada employs human rights commissions, which are independent and offer confidential channels of making complaints (Lanthier et al., 2018).

##### 4.5.4.2 South Asian Law

Nepal and Maldives, located in South Asia, have done a good job by criminalizing workplace harassment without linking it to a particular gender (Rahama & Jahan, 2015). The Sexual Harassment Prevention Act 2015 in Nepal has ensured that all employees have a legal protection and assist them legally against sexual harassment regardless of their gender (ILO, 2004). The sexual harassment in the Act is broadly defined to include physical, verbal and non-verbal behavior. The Sexual Harassment and Abuse Prevention Act 2014 of the Maldives acknowledges that males and females are both victims of harassment (Leeza & Kumar, 2023). The legislation is gender-neutral and has provision of accessible complaint mechanisms.

##### 4.5.4.3 Islamic Legal Frameworks

The Anti-Harassment Law 2018 of Saudi Arabia prohibits any harassment of men and women in the workplace (Khoja, 2020). The legislation is gender neutral and covers every sector with penalties such as imprisonment up to two years and fines up to SAR 100,000. In the Federal Decree Law No. 33 of 2021, the UAE clearly outlaws workplace harassment with no regard to gender difference (

Federal Decree Law No. 33, 2021). Article 14 of the Law is that employers must not employ any violence, harassment, or psychological mistreatment of employees irrespective of their gender (Amir & Dajani, 2019).

#### 4.5.4.4 Major Comparative Analysis Lessons

The analysis of different legal systems shows a step towards acknowledging males as possible victims of workplace harassment (Hashmi et al., 2025). To begin with, the male victims should be recognized by law and their right to be considered equally is a move towards more inclusive theory of equality. Secondly, gender-neutral legal terminology is required because there is a risk that gender-neutral laws given to one gender will inadvertently discriminate against others. Third, the development of independent, accessible and accountable institutions to deal with the cases of harassment at the workplace creates organized and confidential redress forums.

### 5. Discussion: Critical Analysis

The global legal framework has advanced its protection of workplace harassment but regional differences exist regarding how male victimization is handled. The legal systems in Western nations, including the United States, United Kingdom and Canada evolved their original women-focused approach to introduce gender-neutral language and conduct. With the authority of the United States' Title VII of the Civil Rights Act of 1964 any employee has legal access to relief for workplace harassment regardless of gender or sexual identification. Notably, landmark cases such as *Oncale v. Sundowner Offshore Services Inc.* successfully expanded harassment protection to include same-sex harassment which demanded a challenge to traditional gender-based beliefs (Gilani, 2014). The United Kingdom established a globally extensive gender-independent anti-harassment law through its Equality Act 2010. Employers need to protect staff members from unwanted behavior that violates dignity and makes the environment hostile to their presence, according to this law without gender specifications (Hadi, 2022). Such legislation needs successful execution together with a positive workplace culture to succeed. Canada implements both human rights and occupational safety laws which work together to protect workers against every form of workplace harassment. The Canadian model outshines other approaches because it combines psychological care by understanding trauma with legal protection of victims through its harassment framework.

The progress rates across South Asian nations show mixed results that hold encouragement for gender equality. Nepal, together with Maldives demonstrated major advancement through their development of gender-neutral legal structures. The Sexual Harassment Prevention Act 2015 of Nepal stands out under two criteria: its wide coverage area and its detailed process protection. The policy provides complete legal protection to all workers including men, through clear-cut employee rights together with accessible internal and external complaint channels. The society experiences a significant transformation since this contrasts with traditional beliefs about gender roles prevalent across the area (Pinoor Law Associates, 2014). Under the Sexual Harassment and Abuse Prevention Act 2014 of the Maldives men achieve equal rights to just and redressal mechanisms. The rest of South Asian countries including Pakistan, have not yet achieved these legislative advancements. The Pakistani judicial system restricts most harassment debate to female victims, while male harassment cases receive doubt and derision from society. The laws fail to provide gender-neutral identity recognition while protecting male victims and institutions do not establish inclusive protection protocols. The systemic failure to grant justice to male victims of harassment leaves them isolated due to their experience being ignored by an unaccepting judiciary.

Islamic countries are implementing slow yet consequential changes in their workplace harassment laws. Saudi Arabia issued the Anti-Harassment Law of 2018, followed by the workplace regulations in 2019, to establish standard legal protections regarding dignity and workplace safety (Khoja, 2020). Such gender-neutral language presented in these legal documents breaks away from prior legal approaches, which gave primarily protective standing to women.

Under Saudi government leadership, which combines Islamic edicts with socio-economic development aims, the authorities recognize that workplace harassment affects both men and women. Employers remain responsible for compliance under this law by establishing their complaint systems and protecting their staff members. Labor reforms in the UAE took shape with the Federal Decree Law 2021 that explicitly prohibits physical abuse, along with sexual attacks as well as psychological intimidation and verbal harassment without gender distinctions. The UAE demonstrates a complete commitment to implementation through its persistent efforts in spreading awareness along with the creation of confidential complaint systems and clear rules for employers. The actual conditions in these nations show that social restrictions related to masculinity make it difficult for male victims to exercise their gained rights (Khoja & Thomas, 2022).

Islamic workplace ethics develop through the combination of Quranic revelations together with Prophetic teachings. Islamic legal enforcement about work-related behavior does not have established traditional codes but supports three core values of dignity for all humans while upholding modesty and respect between people. Both male and female believers must avoid indecent conduct because the Quran instructs believers to lower their gaze to ensure respectful behavior. Prophet Muhammad's (PBUH) teachings reinforce harm avoidance together with propriety and dignity preservation thus preventing every kind of harassing behavior. The implementation of these moral principles as labor rules in Muslim-dominant nations, including Pakistan will support their establishment of gender-appeal harassment rules while ensuring they remain according to Islamic beliefs. A wide difference persists between religious teachings and actual legislative action that needs to be closed by ongoing law changes and awareness programs (Mohamed & Baig, 2014).

## 6. Conclusion

To sum up, Global legal protection now admits gender-neutral provisions since workplace harassment extends beyond female employees and includes men who face abuse during their professional careers. The legal protection against harassment in the United States USA as well as United Kingdom UK and Canada and their respective frameworks have established extensive standards. Legislative systems of these countries employ proactive employer requirements to stop harassment as well as strict bans on discrimination and harassment. Certain South Asian nations, namely Nepal along with Maldives are leading a patriarchal system transformation by incorporating gender-neutral terminology into their laws and building defense mechanisms for all harassment victims. The Sexual Harassment Prevention Act 2015 of Nepal along with the Sexual Harassment and Abuse Prevention Act 2014 of Maldives serve as significant legal templates for Pakistan and other nations in addressing male victimhood because cultural acceptance of this issue remains limited. The discussion of Islamic countries demonstrates a positive development which merges religious principles with present-day labor legislation. The countries Saudi Arabia along with the United Arab Emirates created gender-neutral anti-harassment legislation which uses Islamic principles of justice and dignity along with modesty. These laws ban every form of harassment while explicitly demanding employer duties and safeguarding privacy of complaints and enforcing legal punishments for violations. With holistic interpretation of Islamic law both genders receive protection against all destructive expressions of harm including psychological abuse as well as verbal and physical mistreatment and the law establishes justice as a shared right for society. Pakistan passed legal protections for workplace harassment of women yet the government has not included men as victims in their institutional framework. The missing legislation acts as a symbol for the widespread denial of male susceptibility which fuels harmful gender-based beliefs about masculinity. Male victims in Pakistan tend to stay quiet and lonely because they receive no justice for their cases. Pakistan's Constitution principle of equality opposes non-gender-neutral laws whose absence jeopardizes the establishment of workspaces free from harassment. The present legal framework does not comply with Islamic principles as it does not protect individuals based on their gender because Islam teaches dignity and protection from harm equally to everyone regardless of gender. Pakistan needs detailed, purposeful

actions to reform its present legal framework. A powerful gender-neutral legislation needs immediate development because it should protect all employees with zero discrimination against women or men.

## References

- Adler, L. S., et al. (2024, May 22). *EEOC enforcement guidance on workplace harassment: Impact on a term, condition or privilege of employment*. Jackson Lewis. Retrieved from <https://www.jacksonlewis.com/insights/eec-enforcement-guidance-workplace-harassment-impact-term-condition-or-privilege-employment>
- Al Nuaimi, S. A., Alkrisheh, M. A., & Al-Tkhayneh, K. M. (2023). The Crime of Sexual Harassment: A Comparative Study Between UAE & French Law. *Journal of Educational and Social Research*, 13.
- Alhassan, A., Faqir, R. S., Mallet, P., Maghaireh, A. M., Alrousan, E., Sayed, M. N. E., & Arfaoui, D. (2025). Sexual Harassment Provisions in the UAE and the French Penal Codes. *Access to Just. E. Eur.*, 461.
- AL-Mustafa, E., & Mohammad, R. (2025). Common Disputes in the UAE Construction Sector: Causes and Methods of Resolution. *Common Disputes in the UAE Construction Sector: Causes and Methods of Resolution (June 30, 2025)*.
- Amir, S. A., & Dajani, H. (2019, December 5). *New UAE harassment law treats male and female victims equally*. The National. Retrieved from <https://www.thenationalnews.com/uae/courts/new-uae-harassment-law-treats-male-and-female-victims-equally-1.947481>
- Bakhadyo, L. (2025). Re-defining Rape Law: Need of Gender Responsive Justice in Nepal. *Kathmandu Sch. L. Rev.*, 14, 75.
- Begeny, C. T., Arshad, H., Cuming, T., Dhariwal, D. K., Fisher, R. A., Franklin, M. D., ... & Newlands, C. (2023). Sexual harassment, sexual assault and rape by colleagues in the surgical workforce, and how women and men are living different realities: observational study using NHS population-derived weights. *British journal of surgery*, 110(11), 1518-1526.
- Bhardwaj, L., & Agrawal, B. S. (2022). Sexual harassment of men: A crime that is a reality. *Indian Journal of Integrated Research in Law*, 2, 1.
- Bhardwaj, L., & Agrawal, B. S. (2022). Sexual Harassment of Men: A Crime That Is a Reality. *Part 1 Indian J. Integrated Rsch. L.*, 2, 1.
- Bostock v. Clayton County, 590 U.S. 644 (2020).
- Canada Labour Code, R.S.C. 1985, c. L-2. Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/L-2/>
- Canadian Human Rights Act, R.S.C. 1985, c. H-6. Retrieved from <https://laws-lois.justice.gc.ca/eng/acts/H-6/>

- Dua, A. (2009). Sexual harassment at work in the United States. *Archives of Sexual Behavior*, 38, 909–921.
- Einarsen, S., & Raknes, B. I. (1997). Harassment in the workplace and the victimization of men. *Violence and Victims*, 12(3), 247–263.
- Enforcement guidance on harassment in the workplace. (2024, April 29). U.S. Equal Employment Opportunity Commission. Retrieved from <https://www.eeoc.gov/laws/guidance/enforcement-guidance-harassment-workplace>
- Equality Act 2010, c. 15 (UK). Retrieved from <https://www.legislation.gov.uk/ukpga/2010/15>
- Ghani, A., Hussain, A., & Abdi, A. R. (2024). Islamic principles on labor rights: Ethical treatment and employer responsibilities. *Journal of Religion and Society*, 2(4), 762-770.
- Gilani, S. R. S., Cavico, F. J., & Mujtaba, B. G. (2014). Harassment at the workplace: A practical review of the laws in the United Kingdom and the United States of America. *Public Organization Review*, 14(1), 1–18.
- Grey, D. (2022). Male victims of sexual harassment in workplace. Hg.org. Retrieved from <https://www.hg.org/legal-articles/male-victims-of-sexual-harassment-in-the-workplace-29542>
- Hadi, A. (2022). Sexual Harassment: An Invisible Crime in Pakistani Society. *New trends in social, humanities and administrative sciences*, 9.
- Hamerton, C. (2025). A critical evaluation of law and policy pertaining to workplace bullying in England and Wales: implications for organisational management and risk. *Strategic HR Review*, 1-6.
- Hammond, L., Ioannou, M., & Fewster, M. (2017). Perceptions of male rape and sexual assault in a male sample from the United Kingdom: Barriers to reporting and the impacts of victimization. *Journal of investigative psychology and offender profiling*, 14(2), 133-149.
- Hashmat, S. S. (2023, November 13). *Men are victims of harassment too*. The Friday Times. Retrieved from <https://thefridaytimes.com/13-Nov-2023/men-are-victims-of-harassment-too>
- Hashmi, M. A. I., Abbasi, S., Abbasi, W. A., & Mallah, M. R. (2025). Criminalization of Honor Killings: Effectiveness of Statutory Amendments in Pakistan. *Research Consortium Archive*, 3(4), 177-189.
- Hodgins, M., Kane, R., Itzkovich, Y., & Fahie, D. (2024). Workplace bullying and harassment in higher education institutions: A scoping review. *International Journal of Environmental Research and Public Health*, 21(9), 1173.
- Ishita, S., & Pragati, P. (2024). *Redressing the imbalance: Legal gaps in protecting men from workplace sexual harassment*. Manupatra Articles. Retrieved from <https://articles.manupatra.com/article-details/redressing-the-imbalance-legal-gaps-in-protecting-men-from-workplace-sexual-harassment>

- Izelmaden, M. (2024). *Understanding Women's Career Experiences in Moroccan Businesses*. Springer Fachmedien Wiesbaden.
- Jones, A. M., Finkelstein, R., & Koehoorn, M. (2018). Disability and workplace harassment and discrimination among Canadian federal public service employees. *Canadian Journal of Public Health, 109*(1), 79–88.
- Khoja, S. (2020, January 7). *Saudi Arabia introduces workplace anti-harassment regulations*. Lexology. Retrieved from <https://www.lexology.com/library/detail.aspx?g=528f5bf2-35c2-4f8e-9225-89d0e6c44c5c>
- Khoja, S., & Thomas, S. (2022). *Labour and employment compliance in Saudi Arabia*. Kluwer Law International.
- Koch, A. (2025). Sexual Harassment in the Workplace: The Globally Addressed but Unresolved Issue. *The Southern University Law Center Journal of International Law, Business, and Policy, 2*(1).
- Lanthier, S., Bielecky, A., & Smith, P. M. (2018). Examining risk of workplace violence in Canada: A sex/gender-based analysis. *Annals of Work Exposures and Health, 62*(8), 1012–1020.
- Leeza, A., & Kumar, S. (2023). A systematic review of Maldivian national laws to combat workplace bullying. *The Maldives National Journal of Research, 11*(2), 19–39.
- Martins, J. M., Shahzad, M. F., & Javed, I. (2023). Assessing the impact of workplace harassment on turnover intention: Evidence from the banking industry. *Emerging Science Journal, 7*(5), 1699-1722.
- Mathura, M., & Khan, L. (2026). Barriers to Males Reporting Sexual Offences. *International Journal of Criminology and Policing Education, 1*.
- McKenzie, S. K., Oliffe, J. L., Black, A., & Collings, S. (2022). Men's experiences of mental illness stigma across the lifespan: a scoping review. *American journal of men's health, 16*(1), 15579883221074789.
- Mohamed, A. A. A., & Baig, F. B. S. (2014). Prevention of sexual harassment: The Islamic law (Syariah) perspective. *Journal of Law, Policy and Globalization, 32*, 95.
- Mulki Criminal Code Act, 2074 (2017) (Nepal).
- Musharbash, L. M. (2025). *Colonial Labor Hierarchies and the Limits of 'Modern Slavery' Discourse in Gulf Cooperation Council (GCC) Migrant Labor Policy: Structural Legal Continuities and the Case of Saudi Arabia and Qatar*. University of California, Los Angeles.
- Nazareno, E., Vidu, A., Merodio, G., & Valls, R. (2022). Men tackling isolating gender violence to fight against sexual harassment. *International Journal of Environmental Research and Public Health, 19*(4), 1924.

- Neupane, G., & Willey-Sthapit, C. (2025). Men's Disassociation From Sexual Harassment in Public Spaces in Nepal. *Men and Masculinities*, 1097184X251374635.
- Neupane, N. (2023). Job satisfaction and workplace harassment: An investigation in the Nepalese development banking sector. *DJIS*, 5(1), 67–77. <https://doi.org/10.3126/djis.v5i1.61784>
- Nicolle, L. R. (1991–1992). Sexual harassment in the workplace: A comparative study of Great Britain and the United States. *Comparative Labor Law Journal*, 13, 293.
- Oncale v. Sundowner Offshore Services, Inc., 523 U.S. 75 (1998).
- Policy, H. (2022). Bullying and Harassment Policy.
- Polok, B. M. (2024). Empowering Women in Labor Market: a comprehensive analysis of recent legal developments in the Kingdom of Saudi Arabia. *Yearbook of Islamic and Middle Eastern Law Online*, 23(1), 381-397.
- Prado, K. Y., et al. (2021). Workplace sexual harassment among men and women farmworkers in USA and Mexico. *Journal of Agromedicine*, 26(2), 220–230.
- Rahama, M. R., & Jahan, N. (2015). Sexual harassment in workplace in South Asia: A comparative study. *IOSR Journal of Business and Management*, 17(6), 49–57.
- Rahman, N., Wahid, A. N. M., & Chaudhary, N. U. (2023). Domestic violence: The legislative overview of South Asian countries. In *Gender-based violence: A comprehensive guide* (pp. 573-592). Cham: Springer International Publishing.
- Rajbhandary, S., & Shrestha, B. (2024). Developing Policies and Mechanisms to Prevent Sexual Harassment in Nepali Higher Education Institutes. *International Journal of Multidisciplinary Perspectives in Higher Education*, 9(2), 68-87.
- Saloni, C. (2021). *Sexual harassment of men at workplace: Need for a legal framework*. iPleaders. Retrieved from <https://blog.ipleaders.in/sexual-harassment-of-men-at-workplace-need-for-a-legal-framework/>
- Saram, M., Hasan, A. A. H., & Aburumman, O. J. (2024). Workplace Harassment Among Employees: A Systematic Review. *Innovative and Intelligent Digital Technologies; Towards an Increased Efficiency*, 737-746.
- Shrestha, P., & Adhikari, D. R. (2025). Workplace sexual harassment cases and policy measures in business organisations. *International Journal of Organizational Analysis*, 33(8), 2222-2250.
- Susan, H. (2008). Bullying in the workplace: Lessons from the United Kingdom. *Minnesota Journal of International Law*, 17, 247.

- TUC. (2022). *Sexual harassment at work survey*. Retrieved from <https://www.tuc.org.uk/news/sexual-harassment-work-survey>
- Türkkan, T., & Odacı, H. (2024). Violence against women: A persistent and rising problem. *Psikiyatride Güncel Yaklaşımlar*, 16(2), 210-224.
- Van Fleet, D. D., & Van Fleet, E. W. (2022). *Bullying and harassment at work: An innovative approach to understanding and prevention*. Edward Elgar Publishing.
- Verma, A. (2025). Right To Equality As Fundamental Right In Nepal. *Available at SSRN 6142987*.
- Wagner, K., & Mallet, P. (2024). A Concise Historic Overview of Arbitration in the UAE: From Past to Present and the Path After Alignment with the UNCITRAL Model Law. *Manchester Journal of Transnational Islamic Law & Practice*, 20(4).
- Waidler, J., Sunny, B., & Rees, G. (2021). *Family-friendly policies in South Asia*. UNICEF Office of Research-Innocenti.
- Workers Protection Act 2024 (UK).