

Harassment at work in France and Italy first hypothesis for an international comparison

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Abstract

Since 2005, in the European working conditions survey (EWCS), a question is asked about harassment at work. Many more workers complain in France than in Italy. Objective differences in violence are not sufficient to explain this large gap in harassment complaints. One has to consider the perception and social regulation of violence, difficulties and conflicts at work. This article is pursuing two goals at the same time. The first is a theoretical goal, in order to move beyond cultural comparisons, to highlight the role of social institutions and regulations in the perception of harassment and to show that harassment is socially constructed in different ways in these countries. The second is an empirical one: to more accurately describe and explain the harassment phenomenon in France and Italy. A cultural approach is frequently used in International comparisons, but it is enough to be able to understand why French workers complain much more about harassment than Italian ones. That's why we also take a societal approach to look at the interactions between educational systems, social interactions, and hierarchical relations at work and the reason why the label of "moral harassment" covers a wider range of situations for French EWCS's respondents than for Italian ones.

Keywords

Harassment

Mobbing

Bullying

Violence

Culture

Education

Social relation

Social regulation

Unions

1. Introduction

In international literature, the English word "Bullying" is mostly used as a generic term to subsume different and heterogeneous labels such as moral harassment, mobbing, employee abuse, psychological violence, etc. Indeed, most researchers assume that "mobbing", "bullying" and "moral harassment" are the same concept described with different words. But this hypothesis has seldom been studied or confirmed. These concepts resort to different academic and national contexts. Mobbing is a notion popularized by the German-born Swedish citizen Heinz Leymann who taught at Umeå University in Stockholm. In line with the Scandinavian tradition of stress studies, Leymann's approach to mobbing includes organizational and collective elements. British journalist Andrea Adams popularized the term "workplace bullying" in a BBC radio broadcast in the late 1980s. Before this, the term "bullying" was mainly used in schools to refer to ostracism or extortion in the schoolyard. French psychiatrist and psychoanalyst Marie-France Hirigoyen coined the term "harcèlement moral" in 1998 framing it in psychological and individualistic terms based on clinical observations.

International studies show dramatic differences in prevalence and complaints from one country to another. But these differences are usually considered as measurement bias due to a supposed gap between the general public's recognition and scientific knowledge of harassment (Hirigoyen, 2017). The starting point of this article is that perception, definition and evaluation of “mobbing”, “bullying” or “moral harassment” are not secondary technical points. One cannot easily dissociate the phenomenon and its semantic and social construction in different contexts. These contexts could be understood in cultural, societal and institutional terms.

For constructionists, “reality” is partly social in the sense that a phenomenon like harassment (or mobbing or bullying) will be considered and treated as real at the end of a complex interactional process mixing objective acts and situations and subjective and intersubjective perceptions and categorizations. As Leymann (1993) explained about mobbing, pathological personalities traits are consequences (and not causes) of the process, when this process comes to an end and has not been regulated by group and individuals, when neither accommodation nor compromise or mediation occurred. That's what sociologists sometimes call the moral career. This career is embedded in a social and institutional context. Some similar negative acts may be perceived as intolerable in some contexts and as normal in others. For instance, among chef and staff of restaurant kitchens, a higher level of verbal and even physical violence may be tolerated more than in other sectors, as noted in several studies (presented in Bloisi & Hoel, 2008). Before notions like harassment and mobbing came to be, other ways to handle difficulties or negative acts perceived as intolerable may have been used. For example, there were collective movements against exploitation or authoritative superiors. But when these kinds of collective responses become more difficult because of our increasingly individualistic society and the decline of trade unions, workers confronted with intolerable negative acts may feel distraught and helpless, leading to suffering and clinical traits of anxiety or depression. In that way, recognition of harassment (or mobbing or bullying) by psychologists, lawyers, social partners, media, etc. may appear as a new way of regulating violence and negative acts at work within the context of greater individualization in human relations and workforce management. Hence, this mode of regulation will shape the personal and social experience of negative acts and influence the clinical traits presented by people recognized as victims of harassment (or mobbing or bullying).

Comparisons between professions or between countries are good ways to investigate the complex links and interactions between words and categories (harassment or mobbing or bullying or other), as well as between complaints, social contexts, psychological and legal recognition, clinical traits, etc. This is all the more important since terminology is not totally set and that words like harassment (or mobbing or bullying) cover both a complex process and the consequences of this process. Beyond internal differences in each country, the national level shows differences in two interwoven dimensions: cultural and institutional (organizational and industrial relations, agencies in charge of health and safety at work...). Compared to the great amount of scientific articles on bullying, few international comparative studies exist (Beale & Hoel, 2010; Escartin, Zapf, Arriet, & Rodriguez-Carballeira, 2010; Giaccone & Di Nunzio, 2015; Milczarek, 2010; Power, Brotheridge, Blenkinsopp, Bowes-Sperry, & Bozionelos, 2011). Most of them focus on cultural differences and show great variations in perception and acceptance of violence and harassment at work.

We chose to compare France and Italy because these two countries seem to have cultural similarities (Latin and Catholic countries) and historical ties. Moreover, laymen and scientists in France and Italy seem to be attached to their own terminology when labelling harassment. The word bullying is not widely accepted. Despite these similarities, according to the European working conditions survey (EWCS), since 2005, France and Italy show, among large European countries, the highest rate (in France) and the lower rate (in Italy) of complaints due to bullying (Table 1).

Table 1. Subjected to harassment last 12 months.

Year	France % declare subjected	Italy % declare subjected
2005	7.7	2.3
2010	9.5	0.9
2015	12.7	2.8

This difference about harassment can also be found, in the same study, in a much more encompassing evaluation of violence at work. For instance, people who declare being “subjected to adverse social behaviour” in 2015 were 24% in France and 10% in Italy. If we use data from other large official enquiries, one still finds differences. For instance, in the 2010 SUMER (*Surveillance médicale des risques professionnels*) study in France, about 22% of French workers were at risk for harassment. According to ISTAT (*Istituto Nazionale di Statistica Italiano*), 6.7% of Italian workers have reported being victims of mobbing in the last 3 years. These figures show that questions about EWCS' measurement bias are important but cannot explain all observed differences.

How can these results be explained? French society is not much more violent than Italian society. Homicide rates are basic and in gross terms because although violence is not limited to homicide, it enables objective measurement of violence (there are many more statistics about homicide than any other type of violence). Between 2008 and 2016, according to Eurostat, the annual average homicide rate for 100,000 inhabitants was higher in France (1.31) than in Italy (0.87). Other figures from police statistics suggest that violence is slightly higher in France. But we do not know if Italian people report less violence to the police, or if violence is objectively higher in France. In any event, objective differences are not enough to explain the large gap in harassment complaints between France and Italy. The meaning of violence is also different. In Italy, violence had recently been associated with political and collective phenomenon: In the 1970's and 1980's during the Years of Lead (*anni di piombo*), right and left wing extremists committed deadly attacks creating more violence in Italy than in France (Moss, 1993). Crimes associated with mafias (*Cosa Nostra* in Sicily, *Ndrangheta* in Calabre, *camorra* in Napoli, etc.) are highly prone to be perceived as collective phenomena. One should consider the perception and social regulation of violence, as well as difficulties and conflicts at work. It could happen that some workers do not perceive themselves as being exposed to negative situations and behaviours such as harassment. Sometimes they may also interpret such behaviours as just a part of work and positive for their well-being if it reinforces the in-group: Gossip and malice directed toward people outside the group may tighten internal links and shared values (Grattagliano, 2006), whereas attacks from outside may trigger solidarity and support among members of in-groups (Giorgi, Leon-Perez, & Arenas, 2015).

Differences in legal systems may also play a role in differential appraisal of harassment. In France, the Law of January 17th, 2002, known as the “law on social modernisation” recognized individuals as victims of moral harassment enabling them to obtain some compensation. According to this law, harassment is a criminal offense if it violates a person's dignity, and/or damages their mental or physical health: “Harassing another person, by repeated words or acts aimed at worsening their working conditions or causing them to worsen, resulting in a situation likely to affect a person's rights, dignity, physical or mental health or hurt his career, is punishable by two years' imprisonment and a 30 000 € fine” (article 222-33-2 of the French Criminal Code). The courts have since given a broad interpretation to employer liability in this definition, including organizational factors: “Management methods implemented by a hierarchical superior as soon as they are manifested for an employee determined by repeated acts whose object or effect is to induce a deterioration of working conditions likely to affect

his rights and dignity, to alter one's physical or mental health or to compromise one's professional future may characterize a moral harassment” (Cass. Soc., 10 November 2009, no. 07-45.321). All enterprises are concerned, no matter how many employees they have.

According to the Italian law, harassment is considered as an employer's failure to comply with its contractual obligation to insure the physical and moral integrity of his/her employees as said in Article 2087 c.c. (Corte di Cassazione, Sezione Lavoro, 6 marzo 2006 n. 4774. The European Framework Agreement of 8th October 2004 (Accordo quadro europeo dell'8 ottobre 2004) is named in the legislative decree n.81/2008. Point 2 of this law explains: “abuse and harassment at work are potential stress factors that the work program 2003-2005 of social European parts provides for the possibility of specific negotiation on these issues.”. It pushes the Member States to review and, when appropriate, supplement their existing legislation regarding the fight against bullying and sexual harassment in the workplace. Point 20 calls to: “urge the social partners in the Member States to develop, among themselves and at Community level, appropriate strategies to combat bullying and violence at work”. Point 16 mentions “notes that one Member State has already adopted legislation to combat harassment in the workplace and that other Member States are in the process of ratifying legislation to combat harassment in the workplace, in most cases recalling the legislation adopted to combat harassment”.

Implemented in Italy through inter-confederal agreements, the Framework Agreement of April 26th, 2007 is dedicated to harassment and violence. The agreement states that its aim is “to prevent and, where appropriate, manage problems of bullying, sexual harassment and physical violence in the workplace”; it “condemns all forms of harassment and violence and confirms the employer's duty to protect workers against such risks” and it states that “Businesses in Europe are required to adopt a zero-tolerance policy towards such behaviour and to establish procedures to deal with cases of harassment and violence where they occur.” This agreement underlines that “Different forms of harassment and violence can occur in the workplace. These may be of a physical, psychological and/or sexual nature and may constitute isolated incidents or more systematic behaviour.”

If Italian legislation is a little more recent than the French, both embrace a large definition of harassment, including organizational harassment. The influence of European agreements and international literature has led to a progressive homogenization of the legal approaches in the two countries. A narrow legal definition in Italy cannot explain the large differences observed in complaints between 2005 and 2015.

Because the two countries seem relatively close in terms of major cultural traits, attitudes and legal systems, other elements and explicative factors should be included in the analysis and supported with diverse empirical data. For this study, two sets of empirical data will be used. First, the 2015 EWCS results (European working conditions survey). This survey has been conducted every five years since 1990 by the European Foundation for the Improvement of Living and Working Conditions. Its purpose is to assess and quantify working conditions of both employees and self-employed on a harmonised basis and to provide homogeneous indicators on risks at work. In 2015, nearly 44,000 workers in 35 European countries were interviewed. Among them, 1520 were French and 1370 Italian.¹ These large representative samples provide rich information about the way French and Italian workers experience and declare harassment. As the European working conditions survey's questionnaire uses the French term “Harcèlement moral” (moral harassment) and, in Italian Prepotenze/Molestie² (which means brutality or bullying and harassment), we will use the word “harassment” as a generic term, make the comparison between France and Italy. But, because other authors sometimes use terms coined in other sociocultural contexts, we will respect their choice and use “mobbing” or “bullying” when they do so.

2. Method

In order to differentiate working conditions and perception of industrial relations in both countries with simple statistical tools (mainly cross tabulations, binary regression and bivariate correlations), we will use EWCS statistics. These statistics describe the social morphology of workers claiming moral harassment in France and Italy. The meaning we can give to these correlations is more important to us than the correlations themselves. For instance, in most European countries, complaints about harassment are higher in unionized companies. That does not mean that trade unions favour harassment, but it is likely that the kind of companies which are unionized (larger companies, with more formalised industrial relations, less face to face problems solving, etc.) are more prone to manage and label difficulties or conflicts as some manifestation of harassment.

A second complementary set of data is composed of interviews with experts in France (9) and Italy (13). These experts are psychologists, occupational doctors and lawyers who accompany and care for harassment victims (Author2). They may provide pertinent information and attest to the scope and the meaning of harassment in their country. These experts are also representative of national debates, controversies and paradigm that shape the definition of harassment in their respective societies (Merrien, 2007). Throughout this paper, when we quote an “expert”, it means one of the 22 experts on our panel.

Finally this article is simultaneously pursuing two goals: The first is theoretical, and about moving beyond cultural comparisons, and highlighting the role of social institutions and regulations in the perception of harassment. It demonstrates that harassment is socially constructed in different ways in both countries. An empirical goal is also pursued: being able to more finely describe and explain the harassment phenomenon in France and Italy. Because international comparisons are difficult tasks, we would like to explain first how we refer to sociological literature in order to build a congruent strategy including cultural and institutional differences in the analysis of violence at work and harassment. In opposition to most international comparisons about psychosocial risks' factors at work, we do not want to rely only on cultural explanations. Therefore, in accordance with a societal approach and EWCS survey results, we will pay attention to the educational system and socio-professional relationships at work. Following a constructivist approach, we will also be attentive to the way harassment is perceived and defined in both countries, as well as to the scope of subjects that are related to harassment complaints. These cultural, institutional and conceptual differences appear to be related in a systemic way and provide a starting point to explain differences observed between France and Italy in EWCS.

2.1. Strategies for international comparisons

International sociological comparisons are framed by the debate between cultural and societal approaches. French sociologist Philippe d'Iribarne illustrates the cultural analyses. In his famous comparison between France and Holland, he tries to show how the history of each country has developed a particular culture that could influence the way social relations work in companies. French workplaces are fundamentally driven by a logic of honour (“La logique de l'honneur”) in which conceptions of what is “noble” and what is “common” regulate and maintain players' strategies often with pride within their own professional body. Each professional group loosely defines what a “good job” is and does not accept external criticism. In that way, management based on profitability is seen as intolerable if it does not consider the quality that workers want to reach. This kind of collective control may therefore be criticized because it could justify domination and some sort of violence (e.g. between trainee/apprentice and his trainer). Workers are not driven by their personal interest, instead they are driven by the group or the corporation's honour and values. Work satisfaction is linked to recognition by peers that meet the prevailing standards, codes and goals in the group. There are hypotheses that could be drawn by this research. Firstly, that countries are characterized by general principles which could be

declined differently in different professional groups. Secondly, that the history of each country may partially explain observed differences and that traces of this history could be found in extensive studies about management and professional relations. Thirdly, that this history may frame the way people perceive situations and collectively manage problems.

Zid and Jeoffrion's study (2014) about organizational changes in France and Canada along with the perception of harassment could be an illustration of this cultural approach. According to the authors, the cultural variable moderates the links between organizational changes and moral harassment. For instance, for the Canadian sample, non-economic dismissals are very strongly correlated to harassment, because they are perceived as a kind of injustice between employees, an attack on employment equity in a country where cultural and ethnic diversity is a very sensitive issue. In France, the highest correlations are observed with the cut in staff and the use of computers to monitor employee performance. Digital control of work is very poorly experienced by employees because it could threaten their professional honour, whereas the cut in staff makes it more difficult for workers to "do a good job".

The societal approach is based on Maurice, Sellier and Sylvestre's book (*Politique de l'éducation et organisation industrielle en France et en Allemagne: essai d'analyse sociétale*, 1982). According to these authors, differences between France and Germany could be explained by interactions of major institutions in each country: the educational system, business organization and management, and industrial relations. After a seven-year comparison of large industrial firms using similar technologies in France and Germany, they concluded that institutional specificities explained more than culture the differences observed. For instance, the importance in Germany of specialized and professional educational training is linked to the importance of technical skills for evaluation, wages and promotions at each level in the hierarchical scale. In France, the opposition between a residual and devalued professional educational system and an egalitarian general educational system, requiring more on the job training, is congruent with promotion and wages linked to seniority. The main contributions of societal analysis are to link macro-social institutions and micro-structures, and to study the interactions between institutions which seem distinct (school, company, careers). Each dimension should not be understood separately. Differences should be analysed as the result of action embedded in institutions. That's why generalization may not work. Differences observed between large industrial corporations may not exist with the same intensity in small businesses or in the tertiary sector.

In the two next parts of this paper, we will try to rely on both research approaches to create initial hypotheses which could explain differences observed between France and Italy. Culture is not an independent variable and institutions for example like the educational system or social and professional relationships may also explain why violence and harassment are perceived differently.

2.2. Interest and limits of cultural explanations

Cultural studies consider the different dimensions of culture as independent traits which, like personality traits, are defined as stable and profoundly embedded in each society. Divergence and conflicts of interest are seen as less relevant because they change more frequently than cultural traits. National differences are essentialized as something no one could easily ameliorate or transform. In that way, inequalities in levels of development may be interpreted as a result of differences in culture and not of economic or social process. However, culture does not exist by itself. It is actualized through social relations and institutions. Moreover, all citizens of one country do not share the same situation and cultural values. The idea of a homogeneous culture that would automatically coincide with national frontiers is more problematic than assumptions about institutions. Hence, major cultural differences between countries should be a first step in understanding differences in social regulations and social perceptions of violence and conflict at work and how these regulations and perception are embedded in social, economic, political and scientific contexts. According to Monaco et al. (2017, p. 26) there are

several factors which play a relevant role in generating mobbing: individual factors (e.g. personality), dyadic factors (interactions among two individuals); group factors (e.g. the “scapegoat”); organizational factors (e.g. the leadership style and work climate) and social factors. This last element refers to cultural elements that would be specific to each country and could have an influence on the origin and interpretation of the phenomenon.

At a first glance, and according to cultural stereotypes, Italian and French society seems similar. Both may be qualified as “Latin”, with catholic traditions. Sometimes French and Italian people are both described as great complainers. Hofstede and Minkov, (2010) show little differences (Table 2).

Table 2. Hofstede's cultural traits in France and Italy.

	France	Italy
Power distance	68	50
Individualism	71	76
Masculinity	43	70
Uncertainty avoidance	86	75
Long term orientation	63	61
Indulgence	48	30

national scores are going from 1 for the lowest to 100 for the highest.

Sources: Michael Minkov (2010), Cultures and Organizations, Software of the Mind (edition 2010).

According to Hofstede's cultural traits, France is characterized by important Power distance (i.e. that the less powerful members of organizations accept that power is distributed unequally), a preference for Uncertainty avoidance, Long term orientation and Low indulgence (i.e. a society that allows relatively little gratification of basic and natural human drives related to enjoying life and having fun). In sum, French workers feel insecure and threatened, even with a good job, the fear of losing one's status and place is present. Once again we quote sociologist Alain D'iribarne (1989) who speaks about “Honour logic” (“*logique de l'honneur*”), where people who possess a small share of power want to defend the dignity associated with their position. This may explain why they are more sensitive to harassment.

In terms of Hofstede's cultural traits, Italy seems close to France, even if Power distance (slightly higher acceptance of inequalities) and Indulgence (Italian think more often than French that gratification of natural human desires should be regulated by strict norms) are lower. On the other hand, Masculinity is higher in Italy (which means for instance that conflict should be solved through force instead of negotiation, a larger gender wage gap, fewer women in management, a preference for higher pay than for fewer working hours). According to Giaccone and Di Nunzio (2015), the prevalence of an individualist-masculine culture, as stated by Giorgi (2008), contributes to the social acceptance of behaviours that would be considered abusive in other social contexts. High power distance could also explain discrepancies among self-reported and ‘real’ levels of bullying in Italy.

Giorgi et al. (2015) specify that context may play a role. When negative acts are common, frequent, and directed to the whole group as in some Italian organizations, bullying will become culturally tolerated.

This opinion is shared by some Italian experts who were interviewed. One said that the most important area of the phenomenon is cultural, because Italian people are used to high levels of contrasts and conflict in workplaces. Perhaps this is why they recognized the existence of the mobbing problem later than the French. “Maybe the Italian culture is more tolerant to violence. Thus, Italian employees may be less likely to be dissatisfied with their jobs as a result of experiencing negative acts at work”. Interviews with experts partially confirm the cultural acceptance of violence and mobbing since 22.2% of French experts think that harassment is socially accepted whereas 41.7% of Italian experts express the same opinion.

EWCS results show that differences in reporting violence (especially verbal abuse and humiliating behaviours) are lower than differences in reporting harassment. That would suggest that common violent behaviours may not seem bad enough to be perceived as harassment in Italy. Bivariate correlations (Pearson) between harassment complaints and verbal abuse or humiliation are higher in France than in Italy. However, bivariate correlation (Pearson) between harassment complaints and physical violence is higher in Italy than in France. That would suggest that Italian respondents consider more harassment in relation with worse forms of violence whereas French more often include non-physical violence in their appraisal of harassment.

2.3. Education, social and professional relationships at work

As a societal approach states, educational systems and professional relations should be understood in a systemic way. This is consistent with the EWCS which indicates that harassment in France seems strongly linked to the type and the level of studies. Interestingly, this is not the case in Italy (Table 3).

Table 3. Education and harassment.

Highest level of education or training successfully completed?	Elementary school only (with or without diploma)	Professional or technical diploma	Higher academic nonprofessional diploma
France	3.3	10.8	18.1
Italy	2.5	2.7	2.8

Lecture: 3.3% of French with no or elementary school diploma, said they are subjected to harassment. Using statistical methods to examine the association between level of education and prevalence of harassment is difficult because variables are not strictly continuous, hierarchical and homogeneous.

One hypothesis would be that a larger number of French workers with graduate diplomas do not tolerate low levels of [autonomy](#) and respect or being harassed when they want to use skills which are not aligned with their superior's opinion. This problem seems less important with professional or technical diplomas, perhaps because it is simpler and less controversial to assess work and work quality in technical matters. French workers who declare “I have the skills to cope with more demanding duties” are more at risk than workers with insufficient or fitted skills. It's not the case for Italians (for whom harassment is more common when there is a lack of training) (Table 4).

Table 4. Skills and work duties balance and harassment.

Q64 - Which of the following statements would best describe your skills in your own work?	I need further training to cope well with my duties	My present skills correspond well to my duties	I have the skills to cope with more demanding duties
France	13.7	9.7	18.3
Italy	3.3	2.4	2.7

Lecture: 13.7% of French who need further training, said they are subjected to harassment.

Bivariate correlation (Pearson) between harassment complaints and skills/work duty balance is slightly negative in France and slightly positive in Italy. This is the same thing with quality standards and quality self-assessment. When the French declare that their job involves “meeting precise quality standards” and “self-assessment of the quality of one’s own work”, the likelihood that they declare having been harassed over the past 12 months increases (respectively 19% and 54% according to binary regression). It is the opposite for the Italians. The probability they declare having been harassed decreases by 64% and 144%. In France, workers claiming they are over-educated for their jobs express more dissatisfaction at work. Moreover, this can create conflicts with colleagues or their hierarchy when two ways of legitimizing authority – experience and diploma – confront each other (Loriol, 2018). Highly experienced French workers may perceive they are not well considered by less experienced young graduates, whereas young graduates may think their diplomas are not valued enough. In contrast, a recent study on the occupational status of workers who had graduated 36 months earlier in Italy shows that a minority of graduates can be considered as overeducated and that job quality is related to their educational trajectory and social capital (Boccuzzo, Fabbris, & Paccagnella, 2016). Therefore, insufficiently interesting jobs will be interpreted more as a social destiny rather than a personal offense.

Other important societal differences reside in social relations at work with colleagues and direct bosses. French workers declare two or three times more frequently that their “direct boss does not respect them as a person” or “is not successful in getting people to work together”. To the same extent, the French more often estimate that “conflicts are not resolved in a fair way”, that “mutual trust does not exist between employees and management”, that “work is not distributed fairly”. According to one expert, a French psychologist, managers think that French people are unable to manage themselves and that they need to be scared in order to obtain what the organization wants. For this reason, a new way of organizing work using violence, fear and surprise was created.

Perhaps one explanation for this lower level of negative perceptions about social relations at work in Italy is that close social relations in small teams or small companies favour informal, day to day conflict resolution and a willingness to compromise. According to an Italian psychologist, sharing goals, a vision and a mission might help to avoid mobbing. Close social relations and trust between colleagues and superiors are also supported by employment stability. In the 2015 EWCS, 85.6% of Italian workers had remained in the same job for at least 5 years as compared to 75.4% of French workers. 29.2% of French workers declared that over the previous three years, they had been involved in a “restructuring or reorganisation at the workplace which had substantially affected their work”. Only 16.9% of the Italians can say the same. Studies show that when workers know their colleagues or immediate boss well, they tend to interpret their behaviour as the result of the situation, while when co-workers aren’t so close, their actions and reactions are more prone to being interpreted as manifestations of their personality or traits of character and experienced as harassment (Loriol, 2015). According to Molé (2012), mobbing began to emerge in Italy with divisions between those who had benefited from the solid employment

protections of the past and new entrants to precarious, unprotected labour markets. Mobbing is directly linked to the state of Italy's job market, in which there are generally two kinds of workers: an employee with a secure and permanent job contract who cannot be fired easily, and a younger employee with a temporary contract, who is more exposed to being fired. Italians respond to the mobbing problems with a neoliberal logic. In other words, the welfare at work is considered as goods to be purchased by citizens (wellbeing services or stress management programs). So, this author underlines the importance of the economic background and consequently the role of neoliberalism in workplace dynamics, mobbing included. A study of 134 Italian workers who had recently experienced organizational change shows that high insecurity at work enhances the statistical relation between workload and bullying (Spagnoli & Balducci, 2017). France was impacted earlier than Italy by individualization and fragilization of the workforce. Employee turn-over, precariousness and heterogeneity of the workforce reduce collective coping and resilience (Loriol, 2017).

Small and medium sized Italian companies are characterized by personal and paternalist relations. Exploitation and domination are more often seen as collective rather than individual issues in larger companies. In Italy more than in France, inequalities are more often understood as the result of social class conflict instead of personal problems. French research and social representation of moral harassment were profoundly influenced by Marie-France Hirigoyen's seminal book, where great importance is given to "perverse", "narcissistic", and "paranoid" managers. First influenced by Leymann's work on mobbing, Italian specialists gave greater importance to organizational factors. Even if these differences erode over time and with the influence of international literature, experts' opinions in our study are still different. Italian experts gave a little more importance to social, sociological, political and cultural matters than the French ones. In contrast, Italians are less unanimous than French in considering harassment as a psychological topic. These differences are also reflected in the kind of treatments or solutions that are privileged. For French experts, "Psychological approach" (80%) and "Removing of the victim's guilt" (60%) are preferred to "Evaluation of the work system" (40%). Instead, Italian experts favour more "Evaluation of the work system" (72.7%) than a "Psychological approach" (36.4%). "Removing of the victim's guilt" is not mentioned by the Italians, perhaps because harassment is less associated with individual guilt, but more with political and sociological conflicts.

Another way to evaluate the size of social representation of harassment and professional relations in France and Italy would be to look at novels and movies. These productions both reflect and frame or format the public image of harassment. In France, the novel *Les heures souterraines*, published in 2009 by Delphine de Vigan tells the story of a woman whose boss first appreciates her and then harasses her after she slightly criticizes one of his decisions. He manipulates other workers and the hierarchy in order to isolate and humiliate her. His motivation is purely psychological and is not linked to the organization or the economic situation of the firm. This analysis is very close to the one done by Marie-France Hirigoyen. A film version of this book was created by Philippe Harel in 2012.

Italian novels seem to grasp this question in a more critical way. Massimo Lolli, in *Volevo solo dormire addosso* (1998), depicts a human resources manager who was ordered to reduce the staff of his company by a third. He did it so well that he became perceived as aggressive and crazy even by his own hierarchy. Here, it is not the manager who is perverse, but the contradictory capitalistic logic of his company. A movie was also adapted from this book in 2004 by Eugenio Cappuccio. Another well-known movie in Italy is *Mi Piace Lavorare: Mobbing* (2004) that describes how a single woman was harassed by her colleague and new boss after a merger that changed the work organization. According to Molé (2012), this movie depicts how an isolated and very dedicated female worker accepts humiliation and absurd tasks because she does not have social resources and support to revolt.

More generally, French novels³ about conflicts in the workplace tend to show the use of violence as a sign of despair and anomaly, a response to humiliation from anonymous or distant order givers

(stakeholders, directorial boards of [multinational firms](#), etc.). Italian novels⁴ on the same subjects tend to present violence as some sort of ritual participating in the construction of a power relationship. It seems here that the meaning of violence is not the same.

Trade unions as well as health and safety institutions may play an important role in the diffusion and recognition of workplace harassment problem. According to the 2015 EWCS, workers who have union representatives and bodies in charge of health and safety in their company are also more likely to report harassment (respectively 6.4% and 5.7% vs 3.5% and 3.9%). Two correlative explanations can be given. Firstly, conflicts and difficulties are treated more formally in companies with such institutions. Secondly, these institutions promote the recognition of these problems. Unionization is higher in Italy (31.6%) than in France (11%) and the state plays a more important role in French industrial relations (Guarriello & Jobert, 2018). France has long considered that health at work is a good subject to find innovative compromises between employers and employees. Government and parliament played a great role in the legal recognition of moral harassment in 2002. Unions have been weakened by low membership and divisions. Therefore, they perceive this recognition as a good means to promote new forms of actions and claims that could legitimate their role and attract new members. In Italy, social partners are independent from the state and innovative negotiations were mainly for work organization and corporate welfare politics such as working from home, child custody, services to individuals, etc., instead of health at the workplace (Guarriello & Jobert, 2018).

2.4. Harassment seems to be perceived as a larger label in France than in Italy

As according to the EWCS, if perceptual differences between France and Italy of violence and harassment complaints may be explained by cultural and institutional factors, it also seems that the label of “moral harassment” covers a wider range of situations for French respondents than for Italians. For instance, discrimination (specially linked to sex and to race, ethnic background or colour) is more prevalent in the Italian representation of harassment. Binary regression shows that being a victim of gender discrimination increases the risk to declare mobbing by 9.23% in Italy and 2.9% in France. Being victim of racial discrimination, ethnic background or colour increases the risk of declaring mobbing by 4.7% in Italy and 2.96% in France. However, bivariate correlations (Pearsons) are weak and similar in both countries. As we have seen, violence in Italy is more often seen as a collective and social phenomenon. Violence linked to racism may be an illustration: internal racism against Southern Italians and external racism against foreigners from African countries are directed toward groups rather than toward individuals. In France, discrimination is only one type of harassment among others, which people complain about. In the same way, Italian people make a distinction between sexual harassment and harassment at work whereas French respondents include “sexual harassment” in the archipelago of “moral harassment”: Throughout the whole Italian sample, only two individuals complained about “sexual harassment” and none of them complained about “moral harassment”. On the contrary, in France, among the seven people who complained about “sexual harassment”, six also complained about “moral harassment”. These differences are mainly a question of the scope of the labels, since Italians who said they were subjected to unwanted sexual attention in the previous month also report that they had been subjected to “moral” harassment, in a slightly higher proportion than in France. However, labels may have effects on performance.

If the first descriptions of moral harassment in France insist on the pathological relationship between a victim who seems to be too much of a perfectionist and a “narcissistic pervert” (Hirigoyen, 1998), the notion has been enlarged to include various situations. Criticism has been made about the role of the organization and the managerial policies in the onset of harassment. Heinz Leyman's approach of mobbing as an interactional process embedded in the social dynamics of the company or the organization has inspired a lot of French experts, without replacing psychological approaches. For instance, one French psychologist who was interviewed explains that the personality disorders of a

leader could increase the probability of bullying. For example, the narcissistic leader wants to have a perfect image of himself and always takes credit for other's work. The paranoid leader does not trust others, so he will constantly check on them and could feel threatened by other's skills. Another example is the antisocial leader that uses the company's funds for illegal business. The same expert, when he/she was asked to describe a case of harassment she has had to deal with, speaks about a woman journalist harassed by her boss because of jealousy due to her professional skills, her beauty and charm.

After the 2002 law in France, jurisprudence defines various faults that could be qualified as harassment: putting aside or disregarding an employee without anything to do; removing an employee's tools or means of work (i.e. Internet or phone connexion), working conditions that contradict medical restrictions; defining some goals that are too difficult to achieve; imposing geographic or job mobility in order to encourage an employee to resign, assigning tasks far below the employee's competencies; etc.

As a French lawyer explained, the jurisprudence is straightforward and clearly defines the limits of bullying. The prevention has a central role in France and the employer has a bigger responsibility in this sense. In fact, if the employer does not take all the measures to prevent and avoid bullying from occurring, he is considered responsible. For example, when an employer puts a lot of pressure on people as his way of managing their work, this could be considered as a cause of bullying behaviours and it is possible to see the consequences even though he has no intention to cause harm (experts' panel). Another expert adds that in France there has been an evolution for the causes of the phenomenon, in fact, now the role of work organization is crucial. A third jurist said that it is difficult to know if we are dealing with bad or strict management or a harassment situation. These blurry boundaries in terms of harassment support an inclusive and extensive definition. According to another expert, during his professional practice the psychologist does not use the legal definition. It is important to find the cause of suffering: "Is it due to the family? Or to work? There are some people that experience moral harassment in simple forms such as very directive and impolite emails from employers, and/or avalanches of directive emails from their employers".

The social representations of moral harassment in France are the result of some sort of geological layer accumulation, where new explanations are added to old ones to produce an extensive definition of the phenomenon. In France, the term harassment encompasses different forms and dimensions (Milczarek, 2010). Another psychologist says that the criteria that should be present when talking about "*harcèlement moral*" is the ethical dimension, the attack on our human essence that makes up the values of the person. Indeed, the juxtaposition of two words with profound implications - harassment: repetition and moral: an ethical judgement - in a context where work relations are more and more individualized, conducts workers to use the label in order to give meaning to a lot of unpleasant experiences. For instance, hospital nurses could speak about "moral harassment" when they are called several times at home to replace a colleague on sick leave: it is seen as a moral issue because managers use work ethics arguments and because nurses consider that their private life and family duties are not respected (Loriol, 2016). Because of the high level of work involvement and a lack of shared standards about work quality, work conflicts are interpreted as a betrayal of professional values. They in turn become interpersonal and moral conflicts that may be labelled as "harassment".

By contrast, in Italy it seems that harassment is more closely associated with a narrower and more stable range of situations: intimidation to push someone to resign, obvious discrimination based on sex, origins, age, etc., competition and conflict between employees induced by management... The first researcher who studied and introduced the term "mobbing" in Italy was Herald Ege (1997). His definition refers to a form of psychological harassment by colleagues or superiors. Such behaviour aims to eliminate a person who has become in some way "uncomfortable", either by pushing him/her to resign or by provoking a motivated dismissal. This action is linked to organizational, social or economic

contexts. This Italian approach has not changed as much as the French one has since 1997. Several experts insist on the notion of persecution and intentionality. As an Italian Occupational doctor said, the fundamental aspect that should be present in order to talk about and define a situation as mobbing is the intentionality and the planning of the action of violence. Another Occupational doctor evoked strategic mobbing (*mobbing strategico*) that is perpetrated intentionally to remove someone from a job. A third Occupational doctor complained about the narrowness of the definition in Italy because it presumes the existence of a reason. But according to this doctor, the most important element is the perception of the victim; if the victim is suffering and that could happen with no specific reason, due to political, managerial or economical dynamics. Other experts recall the strict definition of mobbing as the interpersonal process given by Heinz Leymann. Some organizational behaviour like scapegoating is mentioned. Mobbing should not be confused with normal tension at the workplace according to most Italian experts (Grattagliano et al., 2017).

According to Giorgi, Arenas, and Leon-Perez (2011), there is scarce scientific information and a limited knowledge of what mobbing really is in Italy, thus, previous percentages of workplace bullying have underestimated the number of real cases since the term bullying seems to be used to define several concepts of a different nature. (p. 692). It seems that bullying is a situation considered as less relevant and for that it is “easily accepted and tolerated” (ibidem). In Italy, we have a major prevalence of the phenomenon among white collars and the most victimized workers' category is the public employees. The public sector seems to be more problematic than the private one and the typology of mobbing changes among the two. In the public sector, it is rather a matter of ostracizing or punishing those who have a different point of view from the group; in the private sector it's more similar to bossing (a form of mobbing when the perpetrator of the action is the entire company or indirectly, those holding the) (Ege, 1997).

Italian legal experts also gave a stricter definition, like this occupational judge at an Italian court: The most important aspects that should be present to define a situation as mobbing are the willingness from the employer to harass and isolate the worker and the effective link between the psychological damage and the work situation and work environment. So, both academic or public debates as well as the interpretation of legal framework give a little more circumscribed definition of harassment in Italy than in France.

3. Conclusion

Differences between two large and diverse countries like Italy and France cannot be limited to one simple explication. Culture is not a sufficient explanation because cultural traits exist in a particular set of institutions. That's why differences in complaints about harassment also reveal differences in institutions (educational system, internal and external labour market, trade unions, occupational laws, etc.) and social regulation of conflicts and difficulties at work. International comparison helps to highlight social processes that would be less obvious in a single country. These social processes intertwine and interlace cultural, institutional and semantic processes.

Words and narratives used by doctors, psychologists, lawyers, the media and by workers or trade unions are important for understanding the framing of social representations of harassment (Lewis, 2003; Lorient, 2016) and the possible gap between negative acts at work and complaints (Liefoghe, 2003) or between different social or professional categories of participants (Menesini, Fonzi, & Smith, 2002). In Italy, in academic literature, the word mobbing is the one the most often used and media accounts have popularized the term. But “harassment” and “bullying” are also employed. Moreover, the EWCS questionnaire uses the two Italian words (*Prepotenze* and *molestie*, which mean brutality or bullying and harassment). That could explain why the question does not seem very evocative to some respondents. On the contrary, in France the EWCS questionnaire uses the term *Harcèlement moral* (moral

harassment). This is the same expression that is used in French academic papers and in the public debate with a rich plurality of significations and connotations. So it is easier for French respondents to subsume their problems within this popular expression.

The relation between words and the phenomenon they attempt to define is complex and circular. The success in France of moral harassment's concept could be associated with the importance of psychoanalysis in the intellectual field and the weakening of Marxism and collective resistance. More and more employees feel isolated and individually (and not collectively) attacked. Thus, they perceive "moral harassment" as relevant label to coin their situation. However, in turn, this label frames the social representations of harassment in a psychological way, stressing the role of individual personalities in the process (Loriol, 2016). Further critics of the psychologization induced by the concept of "moral harassment" do not weaken the association between individual personalities and harassment but enlarges and expands the scope of the phenomenon. In Italy, the longer persistence of a Marxist point of view on labour debates and labour sciences is an explanation of the preference for Heinz Leyman's Mobbing concept that could satisfy, for dissimilar reasons, different social actors. Experts may find a more precise and operative concept that could include the result of social psychology research. Trade unions could be sensitive and concerned about an approach that allows for analysis of organizational factors. Employers may prefer a concept that is not too broad and less prone to medicalization and moralization, etc. In return, the use of the word Mobbing, which seems like a precise and technical term, may have limited the extent and the scope of its use and appropriation by workers who often have other ways to express or solve their problems and difficulties.

Since Italian workers and experts use a more narrow and restrictive notion than French, one should expect that clinical traits of harassed workers present more acute pathology in Italy (to be recognized as "harassed" workers should be in a worse situation). That's not the case. According to literature reviews and expert opinions (Dassisti, 2018) differences between clinical observations can be observed via two points: French victims are much more affected by PTSD (Posttraumatic Stress Disorder) symptoms and more by reduction of self-esteem. The combination of a more collective approach of harassment and the perception of violence at work more as a collective question rather than individual question seems to act as protection against this symptom in Italy. Since violence is less experienced as a personal attack, self-esteem is less affected. Since harassment is more a collective problem, workers may feel less isolated and more supported, which could reduce the occurrence of PTSD (Charuvastra & Cloitre, 2008). So, words, semantic questions and perceptions are not bias of measurement, but participate differently in both countries in the circular process of social construction of harassment processes from definition to clinical traits.⁵