



SPAZIO APERTO SERVIZI
SOCIETÀ COOPERATIVA SOCIALE

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POLICY FOR THE PREVENTION AND COMBATING HARASSMENTS AND DISCRIMINATIONS IN THE WORKPLACE

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ART. 1 – PURPOSE AND SCOPE

This Policy defines the principles, responsibilities, and procedures adopted by Spazio Aperto Servizi (hereinafter SAS) to:

- prevent and address all forms of physical, verbal, psychological, digital, and sexual harassment in the workplace;
- prevent and counter all forms of direct and indirect discrimination;
- promote a safe, respectful, and inclusive work environment;
- ensure effective and confidential procedures for handling reports;
- guarantee alignment with SAS's **Child and Adult Safeguarding Policy (CASP)**, in cases where SAS's activities involve contact with vulnerable adult beneficiaries or minors.

Scope of Application

The Policy applies to:

- SAS employees;
- project-based or freelance collaborators;
- volunteers;
- interns and trainees;
- consultants;
- project partners;
- suppliers and contractors;
- anyone operating for or on behalf of SAS.

ART. 2 – DEFINITIONS

HARASSMENT	Any unwanted conduct, including that related to sex, with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment (Legislative Decree 198/2006, Art. 26).
SEXUAL HARASSMENT	Unwanted conduct of a sexual nature in physical, verbal, or non-verbal form. Examples: <ul style="list-style-type: none">- unwanted sexual advances;- requests for sexual favors;- unwanted physical contact;- explicit sexual language or gestures;- sending/displaying pornographic material;- sexual comments about body or appearance.
DIGITAL HARASSMENT	Offensive, intimidating, or persecutory behavior carried out through digital technologies (social media, chats, email, etc.). It includes cyberbullying, cyberstalking, non-consensual sharing of intimate material, and doxing, with the aim of humiliating, threatening, or isolating the victim.
VIOLENCE AT WORK	Abuse, threat, or assault against a person in circumstances related to work.



DISCRIMINATION	Unfair distinctions based on ethnic origin, religion, language, age, socioeconomic status, sexual orientation, gender, disability, and other forms of harassment or insults related to these factors. <ul style="list-style-type: none"> - Direct Discrimination: less favorable treatment based on gender, ethnicity, sexual orientation, age, disability, religion, political opinions, trade union membership, etc. - Indirect Discrimination: apparently neutral rules or practices that result in a disadvantageous impact on specific groups.
VIOLENCE OR DISCRIMINATION BY THIRD PARTIES	Harassment may originate from colleagues, superiors, subordinates, beneficiaries, partners, users, or third parties.

ART. 3 – COMMITMENT OF THE ORGANIZATION

SAS integrates the commitments declared in the CASP with specific ones focused on countering internal harassment.

SAS is committed to:

1. **Prevent** all forms of harassment or discrimination through:
 - o mandatory periodic training for all personnel;
 - o awareness-raising regarding inclusive language;
 - o promotion of a respectful organizational climate;
 - o periodic risk assessment within Risk Assessment Documents (DVR) and HR processes.
2. **Protect** potentially involved individuals, guaranteeing confidentiality, non-retaliation, and access to support.
3. **Ensure access to clear reporting procedures**, available to both internal and external personnel.
4. **Ensure that all partners, suppliers, and contractors adhere to this Policy**, including the signing of a declaration.
5. **Ensure that the protection of the victim is an absolute priority:** we ensure access to psychological, medical, and legal support, assessing cases on a case-by-case basis and taking the severity of the violation into account.

ART. 4 – PREVENTION MEASURES

- Assessment of psychosocial risks in the Risk Assessment Documents (DVR), including risks of harassment and discrimination;
- definition of clear roles (to avoid ambiguities that may lead to abuse of power);
- fair and transparent HR practices (recruitment, evaluation, training);
- clear, established and enforced disciplinary procedures;
- countering offensive or sexist language;
- active promotion of organizational well-being.



ART. 5 – REPORTING

SAS adopts an integrated reporting system.

5.1. To Whom to report

- Dedicated digital reporting form;
- Anti-Harassment and Anti-Discrimination Focal Point;
- HR Manager;
- Quality Manager (or Management System Manager).

5.2. How to report

- dedicated digital form (anonymous or named): MODULO DI SEGNALAZIONE ATTI DI DISCRIMINAZIONE/ MOBBING/MOLESTIE SUL LAVORO
- confidential report via email to focalpoint@spazioapertoservizi.org or through direct communication.

5.3. What to report

- unwanted behavior, harassment, discrimination;
- improper use of hierarchical power;
- verbal, psychological, or physical abuse;
- sexist or derogatory language;
- retaliation following a report.

5.4. Whistleblower protection

- absolute prohibition of retaliation or victimization;
- protection of confidentiality;
- psychological support if necessary.

ART. 6 – HANDLING OF REPORTS

1. Receipt of the report

- Acknowledged and taken in charge within 3 days.

2. Preliminary Analysis

- Assessment of the relevance and urgency;
- potential activation of the Case Management Committee (as already provided for in the CASP).

3. Internal investigation

- collection of testimonies, documents, and evidence;
- listening to the people involved;
- application of the “best interest” principle when the person is vulnerable.

4. Outcome

- Reasoned closure of the case, if unfounded;
- application of organizational or disciplinary measures, or operational changes, if the report is substantiated.



5. **Support for the victim**

- psychological, medical, and legal support

6. **Potential reporting to judicial authorities**

- If elements of a crime emerge
- Consent of the victim when required
- Compliance with regulatory obligations

ART. 7 – TIMELINE

- Acknowledgement of the report: within **3 days**
- Preliminary investigation: within **15 days**
- Adoption of disciplinary/organizational measures: within **15 days** from the end of the investigation
- Interim updates to the reporter (if not anonymous)

ART. 8 – RESPONSABILITIES

8.1. All employees

- Comply with the policy and the Code of Ethics;
- actively contribute to prevention;
- report inappropriate behavior.

8.2. Management

- Create a safe environment;
- supervise team practices;
- monitor risks;
- ensure periodic training.

8.3. Focal Point

- Receive, record, and manage reports;
- guarantee confidentiality;
- coordinate the Committee for complex cases;
- prepare annual reporting for the Management.

8.4. HR

- Integrate prevention measures into recruitment, evaluation, and on-boarding processes;
- initiate disciplinary proceedings;
- monitor well-being indicators.

ART. 9 – COMMUNICATION, TRAINING AND INTERNAL CULTURE

- Annual training on:
 - harassment, discrimination, use of power, and respectful communication;



- prevention of sexist language;
- psychological safety.
- Dissemination of the Policy via:
 - SAS intranet;
 - onboarding;
 - partners and suppliers.

ART. 10 – MONITORING AND REVIEW

- Annual review by the Quality Manager + Focal Point;
- internal self-assessment;
- anonymized annual report to the Management;
- update in the event of regulatory or organizational changes.

RELATED DOCUMENTS

- Codice Etico SAS
- Modello Organizzativo 231
- Child and Adult Safeguarding Policy (CASP)
- Policy HR
- Policy Comunicazione
- Procedura Segnalo SAS – SAS Reporting Procedure (Segnalo SAS)
- Procedura Segnalazioni
- DVR e misure correlate al rischio psicosociali – Risk Assessment Documents (DVR) and related psychosocial risk measures