



Policy against mobbing, gender-based violence, and sexual harassment in the workplace and towards third parties (target population and actions) of the Institute for the Prevention and Treatment of Violence and the Promotion of Gender Equality: VIA-STOP

The Institute for the Prevention & Treatment of Violence and the Promotion of Gender Equality "Via-Stop" was founded in 2008, and it is a Greek non-profit organisation with the primary objective of combating any form of violence, and more specifically:

- Aims to provide assistance, psychological support and therapeutic approaches to all individuals who are subjected to domestic violence.
- Becomes the connecting link as needed between victims and social, legal and welfare services and provides strategies and specialised assistance targeted at the victim's safe exit from the violent environment.
- Drafts and implements domestic violence perpetrator programs, including anger management, individual, court-appointed and group therapy sessions aiming at providing peaceful conflict resolution.
- Implements school outreach programs to address students' perceptions regarding violent behaviours, addressing bullying, domestic violence and all violent behaviours in general. For that expressed purpose, the organisation is implementing prevention and therapeutic programmes.
- Implements educational and training programs on gender-based and domestic violence for professional groups. Examples include lawyers, nursing staff, and members of the Hellenic Police.

The organisation is committed to combat gender-based violence, and more specifically domestic violence, intimate partner violence, child and elderly abuse and other forms of violence such as bullying. Moreover, acts and works against any discrimination based on grounds such as sex, race, colour, ethnic or social origin, national or ethnic minority status, disability, or sexual orientation, for substantial positive social change.

The present policy is directly linked to the Child Protection Institute's policy.

The Institute for the Prevention and Treatment of Violence and the Promotion of Gender Equality, "VIA STOP" is committed to creating and maintaining a friendly, inclusive, safe, and healthy working environment for its members as well as during its activities and interventions with the people it intervenes and trains. VIA-STOP recognises the negative effects of sexual harassment, mobbing and gender-based violence on employees, as well as on third parties with whom it cooperates and/or implements information and training activities, i.e., schools, professional groups such as lawyers, Hellenic Police executives, etc., and does not tolerate any form of mobbing, sexual harassment and gender-based violence, whether direct or indirect.



VIA-STOP will treat all incidents with seriousness and confidentiality, and will immediately investigate all complaints fairly and thoroughly.

VIA-STOP recognises that in order to effectively address and prevent, mobbing, gender-based violence and sexual harassment in the workplace and during its activities with the respective training groups, it is the shared responsibility of all executives and external collaborators to refrain from engaging in harassing behaviour. It also recognises the need to develop prevention programs and measures, as well as mechanisms for reporting any incidents of human rights violation such as sexual harassment.

Who does this policy bind?

Employees, regardless of their position (partners, employees, volunteers, trainees), are required to comply with this policy and ensure that they do not violate it. All employees and management are required to comply with this policy and ensure that no violence, mobbing, sexual harassment or gender-based violence occurs in the workplace, towards therapeutic perpetrators programmes, as well as towards the target population of the Institute's interventions/actions. Any person wishing to file a complaint against a VIA-STOP employee or third party (e.g., external partner) may do so in accordance with this policy. Disciplinary measures will be taken against any employee or third party who violates this policy. Depending on the severity of the offence, disciplinary action may include verbal or written warnings, suspension, termination, and possible criminal charges and legal action. Members of management who knowingly permit or commit acts of violence, mobbing, gender-based violence and sexual harassment or retaliation, including failure to report such incidents immediately, are considered to be in violation of this policy and may be subject to disciplinary review.

Definitions

Violence and harassment in the workplace, based on Article 4 (Part II—Adoption of Measures and Regulations for Harassment and Violence in the Workplace) of Law 4801/2021, are defined as follows:

“Violence and harassment” in the world of work refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment;

“Gender-based violence and harassment” means violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.



"Harassment" refers to forms of behaviour that have the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, or humiliating environment, regardless of whether they constitute a form of discrimination, and includes harassment based on gender or other grounds of discrimination. humiliating, or aggressive environment, whether or not they constitute discrimination, and include harassment based on gender or other grounds of discrimination.

Sexual harassment, according to Article 2 of Law 4604/2019, is defined as follows:
Sexual harassment means any form of unwanted verbal, psychological, or physical behaviour of a sexual nature, resulting in the violation of a person's dignity, in particular by creating an intimidating, hostile, degrading, humiliating, or offensive environment around them.

Examples of prohibited behaviour

VIA-STOP prohibits violence and harassment of any kind, including physical, psychological, gender-based, sexual, whether exercised in person or facilitated by electronic means (email, messages, etc.), whether it is a one-off or repeated occurrence, or whether it is mild or intense, and it shall take immediate and appropriate measures to prevent such incidents in the workplace and during its interventions with target-groups, as well as to investigate and respond to complaints under this policy. The following examples of violence and harassment are indicative, and violations of the relevant policy are not limited to these:

- Physical violence includes assault, such as pushing, grabbing, slapping, biting, scratching, hitting, kicking, or throwing an object.
- Psychological violence and mobbing include:
 - o harassing and intimidating behaviour, such as shouting, threats, insults, use of harmful remarks, use of aggressive language, or any form of verbal abuse;
 - o derogatory comments or mockery about a person's disability
 - o assigning impossible goals and deadlines or pointless tasks that have nothing to do with a person's job
 - o deliberately changing a specific employee's schedule in order to cause them problems
 - o deliberately withholding information that is vital for effective work performance
 - o avoiding, excluding, or marginalising a subordinate or colleague by excluding or preventing them from working with other people or participating in relevant activities



- Sexual violence and harassment include:
 - o sexual assault, rape, indecent exposure, stalking, or obscene gestures
 - o unwanted physical contact, including indecent touching, unwanted touching, caressing, pinching, kissing, or hugging.
 - o making questions or jokes about an employee's personal life or body
 - o offensive comments or jokes about a person's gender identity or sexual orientation
 - o repeatedly asking someone out on a date despite their repeated refusal
 - o asking for sexual favours in exchange for something else (like a promotion).
 - o use and/or promotion of sexual images, messages, etc.
 - o sending sexual emails or text messages.

Anyone can be a victim of violence, mobbing and sexual harassment, regardless of their gender and the gender of the perpetrator, as well as their position in the company. All forms of violence and harassment are prohibited on the VIA-STOP premises or at any social events, business trips, training seminars, or conferences attended by VIA-STOP employees and associates.

Polite, mutually respectful, consensual, pleasant, non-coercive interactions that are appropriate, acceptable, and welcome by both parties are not considered violence or harassment.

Everyday management decisions, legitimate comments and advice regarding work assignments, including negative comments about work performance or work behaviour, the implementation of company policy, or disciplinary measures that are carried out reasonably and respectfully, are not considered harassment.

Employee rights and obligations

- Employees are entitled to work in an environment free of violence and harassment and may withdraw from dangerous situations.
- Employees must demonstrate respect and avoid violence or harassment toward colleagues, program participants, and target populations.
- Employees are required to adhere to the policy preventing violence and sexual or gender-based harassment at work.
- Employees must report violence or sexual and gender-based harassment involving an Institute client to the designated VIA-STOP contact.
- Employees must assist fully in any investigation of violence or harassment incidents.



- All persons involved in investigations are expected to maintain confidentiality in compliance with Law 4808/2021.

Rights and obligations of management

Management will ensure, as far as practicable, that no individual faces violence or sexual or gender-based harassment.

- Management will take, as far as reasonably practicable, measures to prevent violence, mobbing, sexual harassment and gender-based violence, including risk management and the provision of information and training to employees. For this reason, the management of VIA-STOP will appoint a person as a contact person responsible for guiding and informing employees on the prevention and dealing with violence, mobbing, sexual harassment and gender-based violence, such as providing information on the rights of victims of sexual harassment and what is provided legally. To ensure impartiality, the contact person is not the same as the person dealing with complaints, but they work closely with that person. The person responsible for receiving and dealing with complaints will be an external partner specialising in mobbing, sexual harassment and gender-based violence.
- Management expects full cooperation from all staff during investigations.
- Management will take action against any person who engages in mobbing, sexual harassment, or gender-based violence.
- All information collected will be strictly confidential. Management will not disclose the name of the complainant or the circumstances of a complaint, except when disclosure is necessary for the investigation of the incident, for corrective action, or by law.
- Management will ensure that the complainant, victim, or witnesses are not victimised and are protected against any retaliation.
- The administration will cooperate with the competent authorities (Ombudsman, Labour Inspectorate, Hellenic Police, and Judicial Authorities) in cases of violence, sexual and gender-based, in accordance with the provisions and commitments of national legislation.

False accusations

VIA-STOP takes all reports seriously. A report made in good faith will not be used against the employee in any way, nor will it affect the individual's employment status. However, filing unfounded or malicious complaints constitutes abuse of this policy and will be treated as a violation, and may also lead to disciplinary action against the complainant.

Confidentiality and protection from retaliation



All complaints and investigations will be treated confidentially, and the necessary information will be disclosed only where required. No one will be victimised for filing a complaint, and appropriate measures will be taken to ensure that the complainant, victim, and witness are protected from retaliation during and after the investigation.

Reporting procedure

VIA-STOP has established the following procedure for reporting mobbing and sexual harassment. The complaints mechanism is accessible to everyone. We will handle all aspects of the process with confidentiality, impartiality, and fairness. Anyone who is a victim of violence and sexual harassment, knows about or witnesses such an incident, should file a formal complaint or an anonymous report. Complaints will be sent to the reporting person. Formal complaints will then be forwarded directly by the reporting person to the person responsible for handling complaints. Anonymous reports will be handled by the reporting person.

Upon receiving a complaint, VIA-STOP's complaint manager will investigate, interviewing the complainant, victim, and alleged harasser. Victims will be informed of the progress of the investigation and the relevant authorities handling such complaints.

Informal reporting mechanism

Ensures that the alleged harasser understands the complaint mechanism facilitates discussion between the two parties to reach an informal resolution acceptable to the complainant, or refers the matter to a designated mediator for resolution, ensuring that a confidential record is kept of what happens, and follows up on the outcomes of the complaints mechanism to ensure that the unwanted behaviour has stopped.

Formal reporting mechanism

If the victim wishes to file a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome, the formal complaint mechanism is available to resolve the issue. The person handling the complaint will initiate a formal investigation and must act independently and objectively and respect the rights of both the person who made the complaint and the person who is alleged to be responsible for violent and/or harassing behaviour.

The person conducting the investigation will:

- interviews the victim and the alleged perpetrator separately
- interviews witnesses or other involved third parties
- analyses the information and statements of both the parties involved and the witnesses to determine whether the incident(s) took place
- prepares a report outlining findings and recommended actions.
- cooperates with authorities as required.



Victims may also seek legal help outside the company.

Victims' support

VIA-STOP will provide the support and assistance necessary for victims' physical or psychological recovery.

Sanctions and disciplinary measures

Anyone found to have committed mobbing, sexual harassment or/and gender-based violence will be subject to disciplinary action, which may include a verbal or written warning, suspension, or dismissal. For serious incidents, such as physical or sexual assault that could constitute a criminal offence, VIA-STOP will also refer the matter to the police and the competent judiciary authority for investigation and further action.

Implementation of the policy

VIA-STOP will ensure that this policy is distributed to all staff and included in the staff handbook. All new employees will undergo mandatory training on the policy's content when they join the company, and present employees will receive updated training.