



ZERO TOLERANCE POLICY
To safeguard children and the vulnerable

PURPOSE

Anpas Lazio has adopted a zero-tolerance policy towards discrimination and all forms of unlawful harassment, including, but not limited to, sexual harassment perpetrated against minors or vulnerable persons in particular.

This policy clearly states that no form of unlawful discriminatory or harassing conduct towards children, young people, vulnerable adults, or other persons in general will be tolerated in the workplace or in any other place where Anpas Lazio activities are carried out.

Anpas Lazio is committed to enforcing this policy at all levels.

Any officer, manager, supervisor, volunteer, employee, or other person working on behalf of Anpas Lazio who engages in discriminatory behavior or harassment will be subject to disciplinary action, up to and including removal from office. If justified, and depending on the seriousness of the behavior, the perpetrator of the criminal conduct will be reported to the police or other appropriate authorities.

DEFINITION OF HARASSMENT

Harassment includes the following categories of behavior, regardless of whether it occurs once or multiple times:

▪ **Discriminatory behavior**

The act of discrimination consists of treating or considering persons differently, negatively, or adversely because of one or more of the following reasons: race, color, ancestry, place of origin, political belief, religion, age, sex, sexual orientation, marital status, physical or mental disability, criminal conviction served, or any other legally protected status.

▪ **Personal Harassment**

Personal harassment includes any objectionable conduct or comment perpetrated on a one-time or ongoing basis that belittles or causes personal humiliation or embarrassment to the recipient. It may or may not be related to discriminatory conduct.

▪ **Sexual Harassment**

Sexual harassment refers to any conduct, comment, gesture or contact of a sexual nature, occurring in a single situation or in a series of incidents, that could reasonably and arguably cause offense or humiliation or, again, that could reasonably be perceived as workplace harassment as it relates to a training or promotion opportunity, or the award of a contract or other professional benefit. Examples of conduct that may constitute sexual harassment include, but are not limited to:

- (a) unwanted and inappropriate groping.
- (b) sexual assault.
- (c) questions or comments about a person's sex life.
- (d) phone calls, texts, or conversations with a sexual background.
- (e) gender-based insults or jokes that cause embarrassment or humiliation.
- (f) implicit or explicit requests for sexual performance that are offensive or unwelcome.

COMITATO REGIONALE ANPAS LAZIO

Iscritta al Registro Regionale del Volontariato "Sezione Protezione Civile" D.R. N. 3309 del 27.07.2005

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(g) verbal appreciation of the body or comments about sexuality or sexual orientation that are deemed offensive.

▪ **Bullying**

Bullying consists of behavior that aims to attack and belittle a person by subjecting the recipient to unwarranted criticism and humiliation (especially in front of others) or, again, ignoring, nullifying, isolating and excluding them. If it comes from a supervisor, bullying may include acts that cause the recipient of the offending behavior to fail in his or her work with unrealistic deadlines and goals, withholding necessary information and resources, overburdening the recipient or, conversely, depriving the recipient of duties and responsibilities.

▪ **Abuse of Authority**

Abuse of authority refers to an individual who misuses the power and authority granted to him or her by undermining the job performance and career of a subordinate. The exercise of authority accomplished in an illegitimate manner in the work environment must be recognized as inappropriate. Examples of abuse of authority include, but are not limited to, acts or abuses of power such as: intimidation, threats, blackmail or coercion.

▪ **Unhealthy work environment**

An unhealthy work environment is characterized by activities or behaviors, not necessarily directed at anyone, that create a hostile or offensive workplace. Examples of an unhealthy work environment include, but are not limited to sexual, racial or religious slurs or jokes, viewing pornographic or other offensive material.

REPORTING

Anyone who becomes aware of a crime being committed or conduct contrary to this policy is required to report it. It is not considered necessary for the person reporting to have been personally affected by the reported conduct or crime, but it is sufficient to have directly or indirectly witnessed the wrongdoing.

PRIVACY INTENT

The purpose of this policy is:

- Ensure the safety, effective protection and prevention of maltreatment or harm to the health and development of children, youth and other vulnerable persons, in line with Anpas Lazio policy, national and European policies and procedures and current national legislation.
- Ensure good practice and identify accountability.
- Raise awareness among Anpas Lazio volunteers and staff so that everyone is aware of the issues and consequences of sexual harassment and abuse.
- Prevention: Anpas Lazio is committed to ensuring that all staff and volunteers throughout the movement minimize risks to prevent possible harm and/or harassment.
- Anpas Lazio is committed to ensuring effective intervention in response to any report of abuse and/or harassment by supporting and protecting the victim, child or vulnerable person involved.

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Anpas Lazio recognizes its role in safeguarding the wellbeing of children, young people and vulnerable adults. To this end, Anpas Lazio's response, consistent with the intent of this policy, is summarized as follows:

- Work in accordance with policies where appropriate.
- Provide appropriate development/training opportunities for all staff (employees and volunteers) to ensure they are aware of the issue of protecting children and vulnerable adults and the procedures they must follow.
- Ensure all staff (employees and volunteers) understand their responsibilities in relation to the protection of children, youth and vulnerable adults.
- Provide informational materials to all individuals beginning an employment contract with Anpas Lazio or a volunteer assignment.
- Take appropriate action if reports and disclosures received from your staff or external parties indicate potential or actual risks or harassment being perpetrated.

This policy applies to all employees, all volunteers and all members of Management and the Board and all consultants and third parties who work with Anpas Lazio.

Anpas Lazio staff, including employees and volunteers, at the time of signing an employment contract or during the definition of their volunteer assignment, must receive and understand in its entirety

- The content of this policy and the principles included in the Code of Ethics and the Anpas Identity Card;
- The general procedure outlined below for contacting the focal point to whom any harassment or abuse should be reported.

This policy is mandatory and applies to all Anpas Lazio activities (recruitment, selection, training, services provided, partnerships, emergency operations, others).

The policy will be continually reviewed and updated by Anpas Lazio, including because of important legislative changes or other significant events.

GENERAL PROCEDURE

Reporting Procedure

The reporting procedure must be clear, easily accessible and ensure that the dignity of children, young people and vulnerable adults is respected.

In this action, it is mandatory to strictly adhere to the principle of confidentiality of reporting: the names of the persons involved, the events, the identity of the victim and the perpetrator of the sanctionable action must be treated confidentially and communicated only to the offices responsible for the policy.

The witness or subject of abuse may report the incident using the **FORM** attached to this policy.

Focal Point

Anpas Lazio assigns the Human Resources Coordinator the responsibility of handling reports of harassment, abuse or exploitation involving children, youth or vulnerable adults.

The focal point has the duty to report the incident to Regional Management and determine the most appropriate action to be taken.



Management of reports and alerts

Thanks to the activity and control of the focal point, supported by all the necessary forces (internal and/or external), Anpas Lazio provides:

- The collection of all information and documentation related to the reported event;
- The initiation of an internal investigation (also by consulting witnesses);
- Temporary suspension of the reported person from his/her activities;
- Initiation of a disciplinary procedure that allows the accused to present their version of the facts;
- In the presence of necessary evidence and following appropriate internal checks, prompt reporting to the competent police authorities of the crime.

NORMATIVE INDEX

- Convention on the Rights of the Child, May 20, 1989
- Convention on the International Protection of Adults, 13 January 2000
- Treaty of Lisbon
- EU Charter of Human Rights
- EU Regulation / 1398/2014
- Italian Constitution

Il presidente Anpas Lazio

Carlini Vincenzo



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