



Università
Ca' Foscari
Venezia

Code of Conduct to Prevent and Combat Harassment



Recognising the right of all individuals to a working and study environment free from violence and harassment, including gender-based violence and harassment;

Reaffirming that sexual harassment contradicts the principle of equal treatment between men and women and constitutes a form of sex-based discrimination under this Code;

Condemning mobbing and sexual harassment as forms of violence;

Considering that the International Labour Organisation (ILO) Convention No. 190/2019 for the elimination of violence and harassment in the world of work, ratified by Italy through Law No. 4 of 15 January 2021, defines "violence and harassment" in the world of work as 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;

Considering that the same ILO Convention No. 190/2019 defines "gender-based violence and harassment" as 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;

Considering that Directive No. 2006/54 of the European Parliament and Council on the implementation of the principle of equal opportunities and equal treatment of men and women in employment and occupation defines harassment as "where unwanted conduct related to the sex of a person occurs with the intention or effect of violating the dignity of a person, and creating an intimidating, hostile, degrading, humiliating, or offensive environment";

Recognising the importance of preventing harassment to foster a university environment based on respect for fundamental human rights;

Ca' Foscari University of Venice (hereinafter referred to as the "University" or "Institution") hereby establishes the following Code of Conduct:



Article 1 General Principles

1. Ca' Foscari University of Venice reaffirms and upholds the values expressed in its Code of Ethics and Conduct.
2. Ca' Foscari University of Venice guarantees the right of employees and students to a serene, safe, and supportive work/study environment that fosters interpersonal relationships based on respect, equality, and mutual fairness.
3. Ca' Foscari University of Venice seeks to prevent and combat all forms of mobbing, sexual harassment, and violations of human dignity.
4. Ca' Foscari University of Venice adopts the principles outlined in the preamble of the ILO Convention No. 190/2019:
 - a. Recognizing the right of everyone to a world of work free from violence and harassment, including gender-based violence and harassment;
 - b. Recognizing that violence and harassment in the world of work can constitute a human rights violation or abuse, and that violence and harassment is a threat to equal opportunities, is unacceptable and incompatible with decent work;
 - c. Recognizing the importance of a work culture based on mutual respect and dignity of the human being to prevent violence and harassment;
 - d. Acknowledging that violence and harassment in the world of work affects a person's psychological, physical and sexual health, dignity, and family and social environment;
 - e. Recognizing that violence and harassment also affects the quality of public and private services, and may prevent persons, particularly women, from accessing, and remaining and advancing in the labour market;
 - f. Noting that violence and harassment is incompatible with the promotion of sustainable enterprises and impacts negatively on the organization of work, workplace relations, worker engagement, enterprise reputation, and productivity;
 - g. Acknowledging that gender-based violence and harassment disproportionately affects women and girls, and recognizing that an inclusive, integrated and gender-responsive approach, which tackles underlying causes and risk factors, including gender stereotypes, multiple and intersecting forms of discrimination, and unequal gender-based power relations, is essential to ending violence and harassment in the world of work.
5. All roles, professions, and titles referenced in [the Italian version of] this Code in the masculine form shall be understood to also refer to their feminine equivalents.



Article 2

Recipients

1. This Code applies to the entire University Community as identified in paragraph 2, letter a) of the Introduction to the University's Code of Ethics and Conduct and Article 3, paragraph 2, of the University Statute.

Article 3

Definition of Mobbing

1. Mobbing is defined as any aggressive, hostile, or denigrating behaviour directed towards an individual. This behaviour is characterised by physical or psychological persecution, repetition, and a prolonged, systematic nature, and it is capable of creating a disrespectful, humiliating, or harmful environment for the individual's psycho-physical integrity.
2. Mobbing also encompasses discriminatory behaviour based on gender, ethnicity, religion, or political beliefs.
3. Examples of mobbing include:
 - a. Behaviour that harms an individual's image, such as insults, intimidation, threats, slander, insinuations regarding their psychological or physical traits, health, or professional abilities, dissemination of confidential information, or any other act that undermines their reputation;
 - b. Behaviour that undermines professional standing, such as unwarranted removal from duties or transfers for the purpose of persecution, unjustified threats of dismissal, forced resignations, systematic and unwarranted criticism, exclusion from institutional communication, assignment of tasks inappropriate to professional or physical capabilities, wage discrimination, hindering career advancement, and actions that create demotivation and self-doubt;
 - c. Efforts to marginalise and isolate, such as restricting freedom of expression, imposing excessive control, and making frequent and unjustified task changes with a persecutory intent.
4. Any form of retaliation against individuals who report harassment or witness it is considered harassment.
5. An aggravating circumstance is the existence of a disadvantageous, asymmetrical, or hierarchical subordination between the victim and the alleged perpetrator.



Article 4

Definition of Sexual Harassment

1. Sexual harassment is defined as any unwanted behaviour, including physical, verbal, and non-verbal conduct of a sexual nature, intended to intimidate, degrade, humiliate, offend, or violate the dignity of individuals in work and study environments. Sexual harassment is also understood to encompass any form of discrimination based on sex, gender identity, or sexual orientation.
2. A circumstance that exacerbates sexual harassment is the presence of a disadvantaged position, asymmetry, or hierarchical subordination between the victim and the alleged perpetrator.
3. Acts and unwanted behaviours that constitute sexual harassment may include, by way of example:
 - a. vulgar jokes or gestures;
 - b. unwanted, offensive, implicit or explicit requests for sexual favours, potentially accompanied by threats, where acceptance or refusal results in any form of consequence, including retaliation;
 - c. offensive and inappropriate sexually suggestive remarks, along with vulgar or ambiguous comments concerning a person's body or sexual orientation;
 - d. unwanted and unwelcome physical contact;
 - e. persistent and unwelcome advances or propositions;
 - f. sexual coercion;
 - g. environmental harassment that impacts the workplace or study environment, rendering it intimidating, humiliating, or hostile, even in the absence of explicit coercion or demands;
 - h. the display or dissemination, including electronically, of pornographic material within work and study environments;
 - i. the application of sexist criteria in any form of interpersonal relationship;
 - j. explicit or implicit promises of benefits, privileges, or career advancement in work or study in exchange for sexual favours;
 - k. acts of sexual misconduct or sexual violence.

Article 5

Duty of Cooperation

1. Every member of the University Community contributes to creating a working and learning environment founded on respect for the dignity of others. They promote the creation and maintenance of an atmosphere based on respect and behaviours characterised by constructive dialogue and positive communication, intervening when necessary to uphold the values outlined in this Code.



2. In the event of a report, any member of the University Community with relevant information is obliged to cooperate with the Administration in following the necessary procedures to ascertain the facts.

Article 6

Duties of Heads of Departments and Services

1. Directors and Heads of Departments and Services:
 - a. have a responsibility to foster the prevention of harassment in the work and study environments they oversee by establishing rules that promote a climate of respect and behaviours founded on dialogue and positive communication;
 - b. must ensure the dissemination and enforcement of this Code;
 - c. must support and assist victims of harassment by providing a listening ear and guidance on possible actions to take. In particular, in cases involving reports of sexual harassment, they must inform the victim that a specialist is available to handle such situations;
 - d. have a duty to engage in initiatives organised by the University that aim to raise awareness and provide training on matters related to discrimination, workplace bullying, gender-based harassment, and sexual harassment.

Article 7

The Confidential Counsellor

1. To ensure the effective implementation of this Code, the role of the Confidential Counsellor is confirmed.
2. The Confidential Counsellor is an external figure at the University and must possess the requisite experience, interpersonal qualities, and professional skills necessary for their role. The position is appointed via a specific selection process, in line with the University's current regulations on the appointment of independent contractors.
3. The term of the Confidential Counsellor lasts for three years and is renewable immediately once. The appointment may also be revoked upon the proposal of the Equal Opportunities, Employee Well-Being and Inclusion Committee (hereinafter CUG) in cases of serious omissions, delays, or breaches of impartiality, fairness, and confidentiality in the performance of their duties.
4. The Confidential Counsellor is given the necessary resources to fulfil their institutional responsibilities. The University's Board of Directors sets their remuneration.
5. The Confidential Counsellor provides advice and support to any member of the University Community who has faced discrimination or harassment and intervenes to assist in resolving such cases.
6. The Confidential Counsellor also plays a preventative role in addressing workplace distress within the University, identifying problems and critical issues, monitoring



potential risk situations—even those learned indirectly—and proposing appropriate countermeasures and organisational solutions. This is done in coordination with the actions promoted by the CUG. The Counsellor carries out their duties with full autonomy and works in collaboration with the Human Resources Area and the Ethics Committee.

7. The Confidential Counsellor submits an annual report on their activities from the previous year to the University's governing bodies and the CUG, ensuring the anonymity of the individuals involved. Additionally, they must provide a report containing anonymous and aggregated data on received complaints to trade union representatives (RSU, [i.e., Unitary Workplace Union Representation, an elected body representing all employees, both unionised and non-unionised]), Trade Unions, and Workers' Safety Representatives (RLS).

Article 8

Procedure for the Protection of the Harassed Person

1. Without prejudice to legal protection in civil and criminal proceedings, anyone who has experienced discrimination, workplace bullying (mobbing), or sexual harassment may seek assistance from the Confidential Counsellor, who offers the necessary advice and support in identifying the most suitable procedure for resolving the situation.

A. INFORMAL PROCEDURE

2. As part of their role, the Confidential Counsellor:
 - a. works with the harassed person to determine the most suitable course of action to put an end to the harassing behaviour;
 - b. may invite the alleged perpetrator of the harassment for a discussion;
 - c. gathers necessary information to fulfil their role, including collecting testimonies from informed individuals and accessing relevant administrative records;
 - d. at the request of the harassed person, may facilitate joint meetings between them and the alleged perpetrator;
 - e. recommends to the administration any measures considered appropriate to safeguard the psychological and physical well-being of the affected individuals.
3. The Confidential Counsellor shall not take any action without the explicit consent of the person being harassed.
4. The complainant may withdraw the report at any stage of the informal procedure.
5. The informal procedure must be concluded within 120 days from the date of signing the consent.



B. INTERNAL FORMAL PROCEDURE

6. If the individual concerned believes that the proposed informal procedure is unsuitable for the reported case, or if the measures taken by the Confidential Counsellor have not resulted in a satisfactory resolution of the harassing behaviour, the harassed person may initiate the internal formal procedure.
This procedure begins with a written complaint regarding the harassing behaviour, submitted to the General Director or the Rector by either the harassed person or the Confidential Counsellor.
7. If the alleged perpetrator of the harassment is the General Director, the complaint must be submitted to the Rector.
If the alleged perpetrator is the Rector, the complaint must be submitted to the Minister of University and Research.
8. To review the submitted complaints, a Committee shall be established, consisting of one representative from the Administration and two individuals appointed by the CUG, chosen for their suitability, competence, and experience relevant to the Committee's areas of responsibility.
Additionally, three substitute members will be appointed to stand in for primary members if they are unable to participate or if a conflict of interest arises, such as direct involvement in the matter under investigation or personal relationships (friendship or family ties) with either the complainant or the accused. The Committee is appointed by Rectoral Decree.
The Committee elects a Chairperson from among its members, serves a three-year term, and its members may be reappointed only once.
9. In performing its functions, the Committee may seek expert advice, gather testimonies, access relevant administrative records, and request any other information considered useful for evaluating the case.
10. Investigations are carried out with strict confidentiality, especially when gathering testimonies. A thorough record of all meetings and collected evidence is kept.
11. Upon concluding the case, the Committee prepares a comprehensive report.
If the final report identifies aspects that constitute a breach necessitating disciplinary action, the Committee refers the matter to the appropriate authorities responsible for disciplinary proceedings and sanctions, in accordance with the relevant regulations for each category mentioned in Article 2.
12. During this procedure, the victim of the conduct found to be offensive to their dignity may request assistance from the Confidential Counsellor.
13. The Committee must act promptly and conclude the procedure within 45 days. This deadline may be extended by the Committee, provided that a justified notification is given to the relevant parties.
14. Anyone who submits false complaints with the intent to defame another person or gain personal advantage will be held accountable under the applicable laws. If the



false complaint has caused harm to the accused, the University, within its remit, may take action to rehabilitate the individual upon their request.

Article 9

Assurance of Confidentiality and Protection from Retaliation

1. Any individual subjected to sexual harassment, workplace bullying (mobbing), or any other form of discrimination has the right to request the omission of their name from any document that may, for any reason, be made public.
2. Absolute protection of personal data is guaranteed for all parties involved, encompassing circumstances, details, content, statements, and all information that arises throughout the various stages of the described procedure.
3. Any form of retaliation against individuals who report conduct that undermines personal dignity is strictly prohibited. The same guarantees apply to any witnesses involved. Any direct or indirect retaliation will be subject to disciplinary evaluation under the applicable regulations.

Article 10

Training and Awareness

1. The University is committed to:
 - a. ensuring the broadest possible dissemination of this Code within the University Community through suitable communication, training, and awareness-raising activities regarding ethical issues and appropriateness of conduct;
 - b. making the name, location, contact hours, telephone number, and email address of the Confidential Counsellor publicly available;
 - c. implementing specific training initiatives aimed at preventing and raising awareness of the issues covered in this Code, directed at Directors, Heads of Departments, and Service Managers, who are responsible for promoting and fostering a culture of respect for individuals.
2. Every member of the University Community has a duty to familiarise themselves with this Code, comply with its provisions, and actively promote the principles upon which it is based.

Article 11

Final Provisions

1. For any matters not explicitly covered by this Code, reference shall be made to the Statute, the Regulations of Ca' Foscari University of Venice, the Code of Ethics and



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Conduct, the current National Collective Labour Agreement (CCNL) for the University sector, as well as the applicable legislation in force.

2. This Code is approved by the Academic Senate with the favourable vote of the majority of its members, following the positive opinion of the Board of Governors, and is issued by Rector's Decree.