DOREA Educational Institute - Code of Conduct and Anti-Harassment Policy

9th September, 2025 Limassol, Cyprus

1. Purpose and commitment

DOREA Educational Institute ("the Institute") operates a zero-tolerance approach to harassment, bullying, discrimination and abuse in all of its activities. Every person who works, trains or learns with the Institute has the right to be treated with dignity and respect, in a safe and inclusive environment.

This policy sets out the standards of behaviour the Institute expects, how concerns can be raised, and how they will be handled. It reflects the values of the EU Charter of Fundamental Rights and the inclusion, diversity and equal opportunity principles of the Erasmus+ Programme and other EU funding programmes in which the Institute takes part.

2. Scope

This policy applies to everyone involved in the Institute's activities, in any location and in any format (face-to-face, online or blended):

- **Staff:** all employees, whether full-time, part-time, fixed-term or temporary, including management.
- **Trainers and experts:** internal and external trainers, facilitators, researchers and consultants delivering services on the Institute's behalf.
- **Course participants:** all learners attending Erasmus+ KA1 training courses, workshops, study visits and online programmes, in Cyprus and at all other course locations.
- **Project partners and volunteers:** representatives of partner organisations during joint project activities, events and meetings, as well as volunteers and interns.

It covers conduct during courses, project meetings, events, cultural visits and social activities linked to the Institute, travel undertaken for these activities, and all online communication, including email, messaging apps, social media and e-learning platforms.

3. Core principles and expected conduct

Everyone covered by this policy is expected to:

1. **Show respect:** treat others courteously and value differences in culture, language, background, opinion and ability.
2. **Promote inclusion:** welcome all participants equally and support those with fewer opportunities or additional needs.

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3. **Communicate professionally:** use appropriate language in person and online, and respect the views of others in discussion.
4. **Respect boundaries:** respect personal space, privacy and the right of others to say no.
5. **Act with integrity:** be honest, avoid conflicts of interest and follow the Institute's rules and applicable law.
6. **Protect personal data:** handle participants' and colleagues' information in line with the GDPR and the Institute's data protection procedures, including consent for photographs and recordings.
7. **Respect host communities:** behave responsibly at course venues, accommodation and during cultural activities, respecting local laws and customs.
8. **Speak up:** report behaviour that breaches this policy, and support colleagues and participants who raise concerns.

Those in positions of responsibility (management, trainers and group leaders) must model these standards and act promptly when they see or are told of inappropriate behaviour.

4. Definitions

Term	Meaning
Harassment	Unwanted conduct related to a protected characteristic, or of any other kind, that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment.
Sexual harassment	Any unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating a person's dignity. It can be a single incident or repeated behaviour.
Bullying	Repeated, offensive, intimidating or insulting behaviour, or abuse of power, that undermines, humiliates or injures the person on the receiving end.
Discrimination	Treating a person less favourably because of sex, gender identity, sexual orientation, racial or ethnic origin, nationality, religion or belief, disability, age, or any other protected characteristic.
Victimisation	Treating someone badly because they have raised a concern, made a complaint or supported someone else who did so.
Online harassment	Any of the above carried out through digital means, including email, messaging, social media, video calls and e-learning platforms.

What matters is the effect of the behaviour on the person receiving it, not the intention of the person carrying it out.

5. Prohibited behaviour

The following behaviour is not acceptable in any of the Institute's activities. The list gives examples and is not exhaustive.

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- Offensive, sexist, racist, homophobic or otherwise demeaning comments, jokes, gestures or images
- Unwanted physical contact, sexual advances, requests for sexual favours or sexually suggestive remarks
- Intimidation, threats, shouting, aggressive behaviour or physical violence
- Stalking, persistent unwanted contact, or following someone in person or online
- Exclusion, isolation or mocking of a person because of who they are
- Sharing private information, photographs or recordings without consent
- Spreading rumours or making malicious or false allegations
- Abuse of authority, including pressuring participants or junior staff, or offering advantages in exchange for personal favours
- Being under the influence of alcohol or drugs to a degree that affects behaviour or safety during activities
- Retaliation against anyone who reports a concern in good faith

6. Reporting a concern

Anyone who experiences or witnesses behaviour that breaches this policy should report it to the Director of the Institute, Jolanta Banelyte, who is the designated contact for all concerns under this policy.

- **Email:** jb@dorea.org
- **Telephone:** +357 25256606
- **In person:** at the Institute's office or to the Director during any course or event

How reports are handled:

1. **Raise the concern** verbally or in writing, as soon as possible after the incident. Reports can also be made by a trainer or group leader on behalf of a participant.
2. **Acknowledgement** is given within 2 working days.
3. **Initial assessment** of the concern and of any immediate support or safety measures needed, such as changing groups or rooms.
4. **Informal or formal resolution**, depending on the seriousness of the matter and the wishes of the person reporting.
5. **Outcome** communicated to the parties concerned, normally within 20 working days.

Where a matter is minor and the person feels comfortable doing so, they may first raise it directly with the individual concerned. This is never required. Where behaviour may amount to a criminal offence, the person will be supported to contact the police, and emergency services should be called immediately if anyone is in danger.

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7. Investigation, confidentiality and protection from retaliation

All reports are taken seriously and handled promptly, fairly and impartially.

- **Fair process:** both the person reporting and the person concerned are given the opportunity to explain their account and may be accompanied by a colleague or other support person at any meeting.
- **Confidentiality:** information is shared only with those who need it to deal with the matter, and records are kept securely in line with the GDPR.
- **Support:** the person reporting is offered appropriate support throughout, including adjustments to their activities where needed and information on external support services.
- **Non-retaliation:** no one will be disadvantaged for raising a concern in good faith or for taking part in an investigation. Retaliation is itself a serious breach of this policy.
- **False allegations:** reports later found to be unfounded are not a breach of policy. Deliberately false or malicious allegations will be treated as misconduct.

If the person reporting is not satisfied with how their concern has been handled, they may ask for a review and remain free to contact external bodies, such as the Cyprus Ombudsman (Commissioner for Administration and the Protection of Human Rights) in its role as equality body, or the relevant National Agency for Erasmus+ activities.

8. Consequences of a breach

Action taken will be proportionate to the seriousness of the breach and its impact.

Group	Possible measures
Staff	Informal warning, written warning, further training, disciplinary action under Cyprus employment law, up to and including dismissal
Trainers and experts	Removal from a course or activity, termination of the service agreement, no further engagement
Course participants	Verbal or written warning, exclusion from specific activities, removal from the course without refund, notification of the sending organisation
Project partners and volunteers	Formal notification to the partner organisation, exclusion from activities, review of the partnership or volunteering arrangement

Where conduct may be a criminal offence, the Institute may report it to the competent authorities.

9. Legal framework, communication and review

This policy is applied in line with the laws of the Republic of Cyprus, including its equal treatment and anti-discrimination legislation, the EU General Data Protection Regulation (GDPR), and the rules of

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the EU programmes that fund the Institute's activities. Where local law at a course location sets a higher standard, that standard applies.

Communication: the policy is shared with all staff and trainers on appointment, included in course information and welcome packs for participants, and made available to project partners. It is also published on the Institute's website.

Review: the Director reviews the policy at least every two years, or sooner if the law changes or an incident shows it needs improvement.

Approved by	Jolanta Banelyte, Director, DOREA Educational Institute
Date of approval	09th September 2025
Next review	09th September 2027
Approval	Signed by Jolanta Banelyte, Director, 9 September 2025

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