



CODE OF GOOD CONDUCT FOR PREVENTING AND COMBATING HARASSMENT AT WORK

Background

Hotel Régua Douro's health and safety policy involves the organization's commitment to adopting and guaranteeing the application of a strategy and the corresponding allocation of resources with a view to the personal and professional development of its workers, guaranteeing a safe and healthy environment in order to promote the physical and mental health of its professionals.

Law 73/2017 of August 16 strengthened the legislative framework for preventing and combating harassment at work in the public and private sectors, obliging employers to adopt codes of good conduct for preventing and combating harassment at work and to initiate disciplinary proceedings whenever they are aware of sufficient evidence of moral and/or sexual harassment.

This Code of Good Conduct is based on the Hotel Régua Douro's occupational health and safety policy, which was adopted when the Internal Occupational Safety Service was set up. In terms of psychosocial risks, and particularly those related to harassment and violence at work, it sets out the general principles and rules of a legal, ethical and deontological nature that should guide the behavior of its employees, with a view to preventing and combating them.

1. Purpose and Scope

This Code of Conduct establishes the policy, guidelines for professional conduct and procedures for preventing and combating harassment at work among Hotel Régua Douro employees and all those who carry out their professional activity on Hotel Régua Douro premises, including, among others, apprentices.

2. Commitment

- 2.1. Hotel Régua Douro, as an employer, promotes mutual respect for the dignity of workers at work, at all levels, and expressly repudiates any practice of moral and/or sexual harassment at work, as it is incompatible with the dignity of the human person.
- 2.2. Hotel Régua Douro is committed to maintaining in its workplaces a policy of preventing and combating any and all forms of harassment and/or violence, whether lawful or unlawful, based or not on discriminatory factors based on ancestry, age, sex, sexual orientation, gender identity, marital status, family situation, economic situation, education, social origin or condition, genetic heritage, reduced working capacity, disability, chronic illness, nationality, ethnic origin or race, territory of origin, language, religion, political or ideological convictions and trade union membership, or any other discriminatory factors.

3. Policy Principles

- 3.1. Hotel Régua Douro and its employees act with a view to pursuing the public interest, respecting the principles of equality and non-discrimination, and preventing and combating harassment and/or violence at work.
- 3.2. In carrying out their activities, duties and powers, Hotel Régua Douro employees relate to each other in a respectful, loyal, urbane and dignified manner, refraining from verbal, physical and/or psychological abuse and discriminatory behavior towards other employees or third parties, and apply the constitutional and legally enshrined principles regarding the protection of fundamental rights in relations between individuals, namely those relating to equality, personal integrity, confidentiality and good faith.
- 3.3. Harassment and other behaviors involving the use of violence at work are, as a priority, the subject of preventive interventions, without prejudice to corrective and repressive interventions, with the following main objectives:
 - To integrate the prevention of and fight against harassment and/or violence at work, within the scope of Hotel Régua Douro's occupational health and safety policy;
 - To promote an organizational culture of zero tolerance for the practice of harassment;
 - Promote employee awareness of the importance of preventing, combating and eliminating harassment and/or violence at work;
 - Provide workers and their representatives with the necessary tools to prevent, identify and manage situations of harassment;
 - Ensure the existence of internal mechanisms for reporting dangerous situations, as well as a channel for reporting irregularities that could lead to disciplinary action;
 - Ensure the confidentiality of information processing processes and the absence of reprisals against whistleblowers and/or witnesses;

4. Roles and responsibilities

- 4.1. All managers at Hotel Régua Douro are responsible for maintaining a working environment that promotes individual and professional dignity, health, integrity and physical and psychological well-being.
- 4.2. Hotel Régua Douro employees are responsible for:
- Collaborate with their managers in maintaining a working environment that promotes individual and professional dignity, health, integrity and physical and mental well-being;
 - Report situations of serious danger of harassment and/or violence at work.
- 4.3. The central audit and legal affairs department is responsible for:
- Analyze the complaints about irregularities susceptible to disciplinary action that are submitted to it;
 - Propose appropriate disciplinary action in the event of false accusations;
 - Handle the applicable disciplinary procedures;
 - To inform the management of Hotel Régua Douro and the internal occupational health and safety service of the cases analyzed and processed by the 15th of January and June of each year.
- 4.4. The internal occupational health and safety service is responsible for promoting preventive activities to combat harassment, namely:
- Receiving and processing reports of situations of harassment and/or violence at work that workers submit;
 - Provide the advice and assistance that potential victims of harassment and/or violence may require;
 - Promote health checks for workers who show health problems as a result of exposure to harassment and/or violence at work;
 - Receive and process information received from the central audit and legal affairs department;
 - Integrate the information received as part of the assessment of psychosocial risks in the organization into the corresponding action plan and/or make proposals for the Hotel Régua Douro training plan;
 - Organize awareness-raising, training and/or information activities;
 - To monitor and report to the management of Hotel Régua Douro, by the 15th of January and June each year, on the activities carried out under this code;
 - Integrate the data collected into the annual report on health and safety at work.

4.5. The central management support service is responsible for:

- Ensure that the necessary training, information and awareness-raising activities are carried out;
- Without prejudice to the data to be included in the reports it is responsible for ensuring under the terms of the law, informing the internal occupational safety and health service by the 15th of January and June of each year of the number of training, information and awareness-raising activities carried out on the subject and the number of recipients;
- Make this code known whenever new employees are hired, including those on probation or in a trial period, and managers, or whenever service providers are hired who regularly carry out activities with their employees on Hotel Régua Douro premises.

4.6. It is the responsibility of the central information and documentation service to publish this code on the Régua Douro Hotel Internet portal and Intranet page.

5. Communications and whistleblowing

- 5.1. Situations which may be considered a cause of serious danger of harassment and/or violence at work must be reported to the head of Hotel Régua Douro.
- 5.2. Employees who believe they are the target of harassment at work which may constitute a disciplinary offense may report the situation to the head of Hotel Régua Douro.
- 5.3. Communications and complaints, if purely verbal, must be put in writing with full identification of the author or complainant.
- 5.4. Communications and complaints must be supported by detailed information, namely the identification of the harassed person, the identification of the victim, the location(s), the date(s) on which it occurred, a detailed description of the facts and the means of proof, in terms of the protection of personality, equality and the prohibition of discrimination.
- 5.5. Communications and complaints are made via the email address created for this purpose, denuncias@hotelreguadouro.pt.

- 5.6. Without prejudice to the provisions of the previous paragraphs, a situation of harassment can be reported in writing to the Inspectorate-General of Finance, via the email address created for this purpose, ltfp.art4@igf.gov.pt.

6. Internal procedures to be applied

- 6.1. Once a report of serious danger of harassment and/or violence at work has been received, it must be forwarded to the internal occupational health and safety department.
- 6.2. Once the complaint has been received, it must be forwarded to the central audit and legal affairs department for the legally prescribed purposes.
- 6.3. As soon as possible, preliminary information must be sent to the top manager of Hotel Régua Douro within 15 working days of its distribution as to whether there is sufficient evidence of behavior that could be part of an intimidating, hostile or humiliating environment, of coercion or threat, in relation to the person being harassed and, where appropriate, of the falsity of the accusations.
- 6.4. The internal occupational health and safety service must be informed of this information.

7. Confidentiality Protection

- 7.1. The confidentiality of the procedure is guaranteed with regard to the complainant, the person being complained about, the content of the complaint, the means of testimonial, documentary or expert evidence, and the steps taken or to be taken, whereby all those involved must act with the confidentiality necessary to protect the dignity and privacy of each person, and no information must be divulged, in an attempt to guarantee the impartiality, equality and transparency of the entire procedure for all those involved.
- 7.2. Absolute confidentiality is also guaranteed with regard to all personal data collected, which will be used exclusively within the scope of the duties and purposes set out in this code.

- 7.3. The whistleblower and the witnesses indicated by him/her, who have reported or prevented acts of harassment or abusive pressure, cannot be disciplined under the Code of Good Conduct for Preventing and Combating Harassment at Work 9 on the basis of statements or facts contained in the records of judicial or administrative proceedings triggered by harassment or violence at work until a final decision has been made, without prejudice to the exercise of the right to an adversarial hearing, unless they act with the intention of making a false accusation.

8. References

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