



GREEN EUROPEAN FOUNDATION

Policy on Protection from Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH).

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Scope and Purpose

The Green European Foundation (GEF) is committed to providing a safe, inclusive, and respectful environment in which all individuals are treated with dignity and equality. This Policy establishes a clear framework to prevent and address all forms of Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH), in line with applicable European Union and Belgian legislation.

This Policy aims to:

1. prevent all forms of GBD and SAEH through awareness, training, and risk mitigation measures;
2. establish clear procedures for reporting, responding to, and addressing incidents in a fair, confidential, and timely manner;
3. ensure protection against retaliation for individuals who report concerns or participate in investigations;
4. promote a culture of accountability, respect, and zero tolerance for any conduct that undermines dignity or equality.

This Policy applies to all persons engaged in or associated with GEF's activities, including staff members, board members, interns, people involved in advisory bodies, contractors, service providers, partners, volunteers, and participants in events or programmes, irrespective of location. It covers conduct occurring in the workplace, during work-related activities, travel, events, and any other context linked to GEF operations, including online environments.

The Policy is anchored to different legislations and aims to:

- ensure compliance with the principle of equal treatment and non-discrimination, as enshrined in Articles 21 and 23 of the Charter of Fundamental Rights of the European Union and relevant EU directives prohibiting discrimination and harassment¹, and as laid out in Directive 2000/78/EC (Employment Equality Directive) and Directive 2000/43/EC (Racial Equality Directive);
- give effect to Directive 2006/54/EC and its amendments in Directive (EU) 2024/1500 on equal opportunities and equal treatment of women and men in employment, which explicitly prohibits direct and indirect discrimination;
- ensure compliance with Article 7.3 of the Regulation 2025/2445 (EU, Euratom) on the statute and funding of European political parties and European political foundations.

¹ https://commission.europa.eu/topics/human-rights/your-fundamental-rights-eu/know-your-rights/equality/non-discrimination_en

At national level, this Policy is grounded in Belgian legislation governing equality, dignity, and well-being at work, including:

- the Act of 10 May 2007 on combating discrimination and the Gender Act of 10 May 2007, which prohibit discrimination, harassment and sexual harassment based on sex and other protected grounds²;
- the Act of 4 August 1996, and its subsequent amendments, on the well-being of workers, which establishes a comprehensive framework for the prevention of psychosocial risks, including violence, bullying, and sexual harassment in the workplace³;
- the Royal Decree of 10 April 2014 on the Prevention of Psychosocial risks, which lays down the procedures for preventing and addressing psychosocial risks, including violence, bullying and sexual harassment in the workplace.⁴

Statutory basis

This Policy constitutes the Protocol against Sexual Harassment and Gender-Based Discrimination adopted pursuant to Article 4ter of Chapter II of the Statutes of the Green European Foundation. The Policy shall be made publicly available on GEF's website and shall apply to all persons covered under its scope.

By adopting this Policy, GEF affirms its commitment to upholding the highest standards of ethical conduct and to ensuring that its working environments reflect EU values of equality, non-discrimination, and respect for dignity.

Value statement

• 2.1 Zero-tolerance

GEF adopts a strict zero-tolerance approach to all forms of Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH). Any conduct that undermines the dignity, safety, or well-being of individuals—including harassment, sexual harassment, abuse, bullying, or discriminatory behaviour—is

² <https://equal.belgium.be/en/useful-links/legislation>

³ <https://employment.belgium.be/en/themes/well-being-workers/psychosocial-risks-work/statutory-provisions>

⁴ https://www.ejustice.just.fgov.be/cgi/article_body.pl?language=nl&pub_date=2014-04-28&numac=2014202445&caller=list

prohibited and will be addressed promptly, seriously, and in accordance with established procedures.

This commitment reflects GEF's responsibility to ensure environments free from harm, where inappropriate behaviour is neither ignored nor normalised, but actively prevented and addressed.

This Policy has been incorporated into GEF's internal work rules (arbeidsreglement / règlement de travail) in accordance with the Act of 8 April 1965 on work rules and the Act of 4 August 1996 on the well-being of workers. All staff members have been informed of this Policy in the manner prescribed by applicable law.

• 2.2 Power dynamics in GEF's environment

GEF recognises that its work operates within political and institutional contexts where power imbalances may arise, including those linked to hierarchy, influence, seniority, age, or access to resources. These dynamics can affect participation, voice, consent, and the ability to challenge inappropriate behaviour.

GEF is committed to actively identifying, acknowledging, and mitigating such power imbalances. Particular attention is given to preventing the abuse of power, including in relationships involving authority, mentorship, or dependency, and to ensuring that all individuals can engage safely and meaningfully in GEF activities without fear of retaliation or exclusion.

In accordance with the Royal Decree of 10 April 2014 on the prevention of psychosocial risks at work, the Committee for Prevention and Protection at Work (CPBW / CPPT) is consulted on the risk analysis and preventive measures relating to psychosocial risks at GEF, including those arising from power imbalances. GEF ensures that the CPBW is informed and consulted in accordance with its statutory obligations under applicable Belgian well-being legislation.

• 2.3 Organisational culture

GEF fosters an organisational culture grounded in feminist, anti-oppressive, and inclusive values. This includes a commitment to respect, dignity, care, solidarity, and accountability in all interactions. GEF, with and through this policy, promotes environments where individuals feel welcomed, heard, and able to participate fully, and where differences are recognised and valued.

This culture is built through respect for consent and personal boundaries, active efforts to redistribute power and amplify underrepresented voices, openness to learning,

reflection, and continuous improvement and striving for collective responsibility in maintaining safe and respectful spaces.

GEF further commits to addressing harm in a transparent, fair, and restorative manner, and to embedding these principles across its governance, operations, and programmes.

The prevention of Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH) is integrated into GEF's Global Prevention Plan (globaal preventieplan / plan global de prévention) and Annual Action Plan (jaarlijks actieplan / plan d'action annuel), in accordance with Belgian well-being legislation.

• 2.4 Expectations from partners

GEF requires all partners, service providers, facilitators, and collaborators to uphold the same standards set out in this Policy. Compliance with these principles is a condition of participation in GEF-funded or GEF-led activities.

Partners are expected to:

- actively contribute to the creation of safe, respectful, and inclusive environments;
- prevent and refrain from any form of GBD or SAEH;
- support individuals in raising concerns and cooperate with reporting and response mechanisms;
- align their conduct and, where applicable, their internal policies with the principles of this Policy.

GEF reserves the right to take appropriate measures, including exclusion from activities or partnerships, in cases of non-compliance.

Definitions, principles and commitments

• 3.1 Definitions

Sexual harassment means any form of unwanted verbal, non-verbal, or physical conduct of a sexual nature, including advances, requests for sexual favours, or other conduct, which has the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating, or offensive environment. Such conduct may arise from a single incident or a pattern of behaviour and may occur between persons of any gender.

Sexual exploitation means any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, obtaining financial, social, or political advantage through the sexual exploitation of another person.

Sexual abuse means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal, coercive, or abusive conditions. This includes, but is not limited to, sexual violence and any sexual activity involving a child.

Gender-Based Discrimination (GBD) means any distinction, exclusion, or restriction based on sex, gender identity, gender expression, or related characteristics, which has the purpose or effect of impairing or nullifying the recognition, enjoyment, or exercise of rights, opportunities, or equal participation in any area covered by this Policy, including employment, working conditions, access to resources, and participation in organisational activities.

Abuse of power means the misuse of authority, position, influence, or access to resources for personal advantage or to exploit, harm, or disadvantage another person, including situations where consent is compromised due to unequal power relations, whether real or perceived.

Survivor means the person who has experienced, or is alleged to have experienced, conduct prohibited under this Policy.

Complainant means the person who raises a concern or submits a complaint under this Policy. The complainant may also be the survivor or may act on behalf of the survivor.

Subject of complaint (SoC) means the person against whom an allegation, concern, or complaint has been made.

Review Committee means the body established under this Policy to oversee inquiry outcomes, review inquiry findings, and determine any organisational, contractual, corrective, protective, or disciplinary measures arising from complaints made under this Policy.

Child means any person under the age of 18 years, irrespective of national definitions of age of majority or consent. Sexual activity with a child is strictly prohibited and constitutes serious misconduct.

Sexual relationship (in safeguarding contexts) means any physically intimate or sexually related interaction, including online or digital interactions. Where such relationships involve actual, potential, or perceived power imbalances, conflicts of interest, or dependency, they may constitute a breach of this Policy and shall be declared and appropriately managed.

• 3.2 Survivor-centred approach

GEF adopts a survivor-centred approach in the prevention and response to Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH). This

approach places the rights, needs, dignity, and autonomy of the survivor(s) at the centre of all actions and decisions. It requires that survivors are treated with respect, are able to make informed choices about the process, and are supported in a manner that prioritises their safety, confidentiality, and well-being at all times. GEF is committed to ensuring that no survivor is subject to further harm, stigma, or re-traumatisation as a result of reporting or participating in procedures, and that responses are adapted to individual needs and circumstances. This approach further implies non-discrimination, ensuring that all individuals receive equal and fair treatment regardless of gender, identity, background, or status, and is implemented in a manner consistent with GEF's values of care, accountability, and empowerment.

• 3.3 Accountability in the complaint procedures

GEF is committed to ensuring that all complaints and concerns related to Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH) are handled in a fair, transparent, timely, and accountable manner. All reports will be taken seriously, assessed promptly, and, where appropriate, subject to impartial and confidential review and investigation. Procedures will be guided by principles of due process, confidentiality, and respect for all parties involved, while ensuring that appropriate action is taken where misconduct is established. GEF will ensure that decision-making processes are documented, proportionate, and based on established standards, and that outcomes are implemented consistently. This includes taking corrective and disciplinary measures where necessary, supporting survivors in line with a survivor-centred approach, and preventing further harm. Accountability also entails learning from reported cases, strengthening preventive measures, and ensuring that individuals responsible for misconduct are held answerable for their actions.

Prohibited behaviours

GEF is committed to ensuring an inclusive, respectful and equitable working environment. Discrimination, including gender-based discrimination, is prohibited in all aspects of GEF's activities, including recruitment and employment, internships, event participation, Board activities, partnerships and all other activities carried out by or on behalf of GEF.

Discrimination, defined as treating or proposing to treat an individual or group unfavourably, unfairly, or unequally based on race, color, national origin, birth, descent, language, sex, religion or belief, age, disability, marital status, civil status, sexual orientation, gender identity or expression, pregnancy, pregnancy-related condition, health condition (current or future), military or veteran status, political opinion, social origin, citizenship status, genetic information, physical characteristics, being a victim of domestic violence or assault, individual membership of a trade union, wealth / property status, or any other characteristic or status protected under applicable laws, is prohibited. Discrimination by or against affiliates based on any protected characteristic or status will not be tolerated by GEF. GEF is an equal opportunity employer, and

this policy extends to all aspects of the employment relationship, including, but not limited to, decisions involving an employee's compensation and benefits, recruitment & selection, and terms and conditions of employment.

According to UNIA, gender discrimination occurs when one person is treated less favourably than another because of his or her gender⁵. This refers to differential treatment based on sex, pregnancy, medically assisted reproduction, childbirth, breastfeeding, maternity, family responsibilities, gender identity, gender expression, sexual characteristics medical or social transition. All these criteria are considered equivalent to the gender criterion.

• 4.1 Gender based discrimination in recruitment

The recruitment processes at GEF are geared to appeal to all genders. GEF seeks to develop maximum awareness of possible biases that could occur as part of the recruitment process, such as the bias that often are communicated in the phrasing of job descriptions, and seeks to minimise the perpetuation of these harmful practices through the prevention methods outlined below:

- Using gender-neutral and inclusive language in all vacancy announcements and recruitment materials.
- Reviewing job descriptions to ensure that only genuinely necessary qualifications and experience requirements are included.
- Advertising vacancies through diverse channels and networks to reach candidates from different backgrounds and genders.
- Providing training and awareness-raising for staff involved in recruitment on unconscious bias, discrimination, and inclusive hiring practices.
- Applying transparent and objective selection criteria that are established before the recruitment process begins.
- Using structured interviews with standardised questions for all candidates applying for the same position.
- Ensuring diversity in recruitment panels, including gender diversity.
- Assessing candidates on the basis of competencies, skills, experience, and potential rather than assumptions linked to gender, family status, age, or other personal characteristics.
- Monitoring recruitment outcomes on a periodic basis to identify potential disparities or patterns that may indicate unintended bias.
- Providing reasonable accommodations throughout the recruitment process to ensure equal access for all candidates.
- Encouraging applicants of underrepresented genders in specific functions or occupational categories to apply.

⁵ <https://www.unia.be/en/discrimination-gender>

• 4.2 Gender based discrimination in salary allocation

GEF strictly prohibits gender-based discrimination in salary allocation, remuneration, and employment conditions. Decisions relating to salary, salary progression, benefits, and remuneration shall be based on objective, transparent and role-related criteria, and shall not be influenced by gender or other protected characteristics. Staff members involved in recruitment, salary setting, or remuneration reviews shall communicate the objective criteria used to determine an applicant's or employee's position within the salary scale. This aims to minimise the risk that differences in negotiation practices – including those linked to structural gender inequalities – result in unequal pay for equal or equivalent work.

• 4.3 Gender based discrimination in invisible and care work in the workplace

GEF strictly condemns discrimination based on gender in the allocation and execution of invisible work and care work within the organisation. GEF must ensure that existing and future distribution of care and invisible work inside the workplace is equally distributed when tasks go beyond the job description. Managers and staff with supervisory responsibilities shall seek to ensure that non-promotable or informal workplace tasks are distributed fairly across teams. These include, but are not limited to, taking meeting notes, organising internal celebrations or social events, preparing meeting rooms, welcoming guests, cleaning or decluttering shared spaces, watering plants, or other administrative or logistical tasks that are not formally recognised within a person's role. GEF recognises that the unequal allocation of such tasks may reinforce structural gender inequalities by placing a disproportionate burden on certain employees while limiting their opportunities to undertake work that contributes to professional development, visibility, or career progression.

• 4.4 Gender based discrimination in participation in events

This policy and [GEF's Safe Spaces Policy](#) are complementary and apply to all persons participating in or associated with GEF activities, including staff members, interns, Board members, contractors, service providers, partners, volunteers, speakers and participants, regardless of the location or format of the activity. Both policies shall be communicated to participants before or during GEF events through appropriate written and verbal means.

For public-facing events and other activities where appropriate, GEF shall designate one or more Safe Persons who can be approached confidentially by any participant wishing to report or discuss inappropriate behaviour. The number of designated Safe Persons should be proportionate to the size and nature of the event, ensuring that participants have accessible points of contact throughout the activity.

GEF shall actively promote gender equality and inclusive participation throughout the planning and delivery of its events. This includes taking reasonable steps to achieve balanced

representation among speakers, moderators and panels; encouraging diverse participation amongst attendees; and promoting equitable participation during discussions, including opportunities to speak, contribute during question-and-answer sessions, and participate in other interactive formats.

When organising events, GEF shall, where reasonably possible, take into account accessibility and caring responsibilities in the choice of dates, schedules, formats and venues, with the aim of reducing unnecessary barriers to participation for staff, speakers, participants, contractors and service providers.

GEF shall maintain internal procedures supporting the participation of staff members with caring responsibilities, including, where applicable, provisions relating to childcare support and the reimbursement of eligible expenses in accordance with GEF's internal financial and operational procedures.

• 4.5 Gender based (psychological) violence and harassment

“Psychological harassment at work is defined, under Belgian law, as a wrongful set of multiple similar or diverse forms of conduct, inside or outside the organisation, occurring over a period of time, which has the purpose or effect of undermining the personality, dignity, or physical or psychological integrity of a worker during the performance of their work, of jeopardising their employment, or of creating a threatening, hostile, offensive, humiliating or distressing environment, manifesting in particular through conduct, words, intimidation, acts, gestures or unilateral written communications.” — Act of 4 August 1996 on the well-being of workers, Article 32ter, as amended by the Act of 28 February 2014 (Belgium)

Psychological harassment always involves persistent or repetitive actions and it is not a one-time event.

Psychological harassment may take many forms, including, but not limited to:

- Making offensive, degrading, or humiliating remarks, particularly in the presence of others.
- Engaging in bullying, intimidation, hostility, or persistent antagonistic behaviour.
- Applying undue pressure or engaging in conduct intended to undermine an individual.
- Refusing, without legitimate reason, to communicate or cooperate with a colleague.
- Making disparaging comments about a person's professional abilities, performance, or personal characteristics.
- Making unfounded, misleading, or malicious accusations.
- Using abusive, threatening, or intimidating language, whether spoken, written, or electronic.
- Dismissing, belittling, or systematically undermining an individual's contributions, ideas, or achievements.

- Excluding, isolating, ignoring, rejecting, humiliating, or marginalising an individual.
- Deliberately damaging or interfering with an individual's professional or social relationships in the workplace.
- Engaging in stalking or other forms of intrusive and unwanted monitoring or contact.
- Intentionally withholding meaningful work or failing to assign tasks reasonably aligned with an individual's role and responsibilities.
- Requiring or pressuring staff to remain continuously available outside normal working hours or during periods of leave.
- Expecting staff to regularly perform personal tasks or errands for managers, Board members, or other individuals that fall outside the scope of their employment.

Psychological harassment is typically characterised by repeated or systematic conduct that may persist over time and, if left unaddressed, can escalate. It may have significant consequences for an individual's physical and psychological health, dignity, and ability to work.

GEF prohibits psychological harassment in any form, including but not limited to the behaviours described above. Such conduct constitutes misconduct and may result in disciplinary measures, up to and including termination of employment, service agreement, Board mandate, or other contractual relationship with GEF, where appropriate. This prohibition applies to all persons engaged in or associated with GEF's activities, including staff members, interns, Board members, contractors, service providers, partners, volunteers, speakers and participants in GEF events and programmes.

• 4.6 Sexual exploitation and abuse

Exploitation and abuse by all persons engaged in or associated with GEF's activities, including staff members, interns, contractors, service providers, partners, volunteers, and participants in events or programmes is prohibited and constitutes an act of misconduct sanctionable with termination of employment or service agreement.

• 4.7 Sexual activity with children (persons under the age of 18)

Sexual activity with children (persons under the age of 18) is strictly prohibited regardless of the age of majority or age of consent locally. A mistaken belief regarding the age of a child shall not constitute a defence. Any breach of this provision shall be considered gross misconduct and may result in disciplinary measures up to and including termination of employment, service agreement, Board mandate, or other contractual relationship with GEF, and referral to the competent authorities where appropriate.

- **4.8 Exchange of money, employment, goods or services for sex, including sexual favours**

GEF strictly prohibits the exchange of money, employment, internships, contracts, grants, travel support, goods, services, professional opportunities, or any other benefit for sex, sexual favours, or other forms of humiliating, degrading, or exploitative behaviour. Employees, Board members, contractors, consultants, and other persons acting on behalf of GEF must not make access to employment, funding, participation opportunities, services, benefits, or organisational resources contingent upon sexual activity or sexual favours, whether explicitly or implicitly. Such conduct constitutes serious misconduct and may result in disciplinary measures up to and including termination of employment, service agreement, Board mandate, or other contractual relationship with GEF.

- **4.9 Sexual activity with peers or employees of partner organisations**

GEF does not prohibit consensual romantic or sexual relationships between adults, including between colleagues or between individuals working in partner organisations. However, where such relationships involve actual, potential, or perceived power imbalances, conflicts of interest, supervisory authority, financial influence, or decision-making responsibilities, they must be declared in writing to the designated confidential contact person as soon as reasonably possible.

Individuals involved in such relationships remain responsible for maintaining professional conduct, ensuring that work-related matters are handled impartially, and preventing any actual or perceived favouritism, discrimination, retaliation, or conflict of interest. Where necessary, GEF may implement appropriate measures to mitigate risks arising from the relationship.

Roles, responsibilities and prevention measures

- **5.1 Roles and Responsibilities**

All persons covered by this Policy

All persons engaged in or associated with GEF activities, including staff members, interns, Board members, contractors, consultants, service providers, volunteers, partners and participants in GEF activities, share responsibility for maintaining a safe, respectful, inclusive and discrimination-free environment. They are expected to:

- comply with this Policy and contribute to its implementation;
- treat others with dignity, respect and professionalism;
- refrain from any conduct prohibited under this Policy;
- raise concerns or report suspected misconduct where appropriate;
- cooperate in good faith with complaint, inquiry and safeguarding procedures;
- maintain confidentiality when involved in any procedure under this Policy;

- refrain from retaliation against any person who raises a concern, files a complaint, participates in an inquiry, or supports another individual through the process.

Pursuant to Article 9, §2 of the Act of 4 August 1996 on the well-being of workers, GEF is required to include a provision on compliance with this Policy in any written agreement concluded with a contractor, consultant or service provider who physically performs work on GEF's premises or at GEF-organised events. Where such an agreement is in place, the contracting party must also ensure that any subcontractors engaged by them comply with the same obligation.

Head of Units and Persons with Supervisory Responsibilities

Head of Units, team leaders and others exercising supervisory authority have additional responsibilities to:

- promote a culture of respect, equality and inclusion within their teams;
- lead by example and demonstrate behaviour consistent with this Policy;
- identify and address risks linked to power imbalances, exclusionary practices or inappropriate conduct;
- ensure that work opportunities, visibility, responsibilities and informal workplace tasks are distributed fairly and without gender bias;
- take concerns raised by staff seriously and refer them to the appropriate mechanisms without delay;
- support the implementation of interim measures where required;
- contribute to the prevention of retaliation and the protection of individuals involved in complaint procedures.

Confidential Contact Person (CCP)

The Confidential Contact Person serves as the first point of contact for concerns relating to Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH).

The CCP may not be a member of GEF's management, nor an employer's delegate or personnel representative in the works council or the Committee for Prevention and Protection at Work, nor a member of a trade union delegation, in accordance with Article 32sexies, §2 of the Act of 4 August 1996.

The CCP is responsible for:

- providing a confidential and supportive space for individuals raising concerns;
- explaining available reporting options and complaint pathways;
- supporting individuals in making informed decisions about next steps;
- maintaining confidentiality in accordance with this Policy;
- coordinating referrals to support services where appropriate;
- facilitating the launch of formal procedures where requested or required;
- monitoring the overall functioning of reporting and support mechanisms.

The CCP does not determine responsibility, impose sanctions or conduct investigations on their own.

The Confidential Contact Person shall provide an annual anonymised report to the Board of Directors summarising the number and nature of concerns raised, actions taken, lessons learned, and recommendations for strengthening prevention and response measures. The report shall not contain information that could directly or indirectly identify individuals involved.

In GEF, this role is taken by the Internal Prevention Adviser (see below).

Prevention Adviser for Psychosocial Aspects

In accordance with the Act of 4 August 1996 on the well-being of workers and the Royal Decree of 10 April 2014 on the prevention of psychosocial risks at work, GEF designates a Prevention Adviser specialised in psychosocial aspects, either as part of its internal prevention service or through an accredited external prevention and protection service. The Prevention Adviser holds specific legal competences under Belgian law, including the authority to receive formal requests for psychosocial intervention, conduct risk analyses, and formulate written opinions to the employer. Where the Prevention Adviser and the CCP roles are taken by different people, under Article 65 of the Royal Decree of 10 April 2014, the Prevention Adviser and the CCP are legally required to consult regularly and to maintain all contacts necessary for the fulfilment of their respective functions, including the exchange of relevant information concerning their psychosocial interventions.

The contact details of the Internal Prevention Adviser are:
Giuseppina Tucci, Head of Operations – Giuseppina.tucc@gef.eu .

**The contact details of the External Prevention Adviser are: De Bock
Anne-Sophie, Conseiller en prévention Aspects psychosociaux,
Securex, 0800 100 59**

Director

The Director is responsible for ensuring the effective implementation of this Policy and for:

- allocating adequate resources for prevention, reporting and response mechanisms;
- ensuring that complaints are handled in accordance with established procedures;
- implementing interim, organisational or disciplinary measures where authorised;
- ensuring that recommendations arising from inquiries are considered and acted upon;
- supporting organisational learning and continuous improvement.

Board of Directors

The Board holds overall governance responsibility for the implementation and oversight of this Policy. The Board shall:

- ensure that GEF maintains effective safeguarding, anti-discrimination and anti-harassment mechanisms;
- ensure compliance with Article 4ter of the Statutes and report annually on the implementation of this Policy and on anonymised trends, incidents and measures taken, while preserving the confidentiality of all persons concerned;
- approve revisions to the Policy where appropriate;
- oversee the appointment of designated contact persons and complaint-handling structures;
- receive anonymised reporting on implementation while respecting confidentiality obligations.

Review Committee

The Review Committee is the body responsible for reviewing the outcome of inquiries conducted under this Policy and for determining any organisational, protective, corrective, contractual, or disciplinary measures that may follow. The Panel ensures that decisions are taken fairly, impartially, confidentially, and in accordance with the principles set out in this Policy. The Review Committee is composed of the Confidential Contact Person (CCP), who coordinates the work of the Panel but does not participate in adjudicating the case, the Director (or a substitute staff member where the complaint concerns the Director or where a conflict of interest exists), and the Board Member designated as responsible for anti-harassment matters (or an alternative Board Member designated by the Board where the complaint concerns the designated Board Member, where that Board Member is otherwise involved in the matter, or where a conflict of interest on their part has been identified).

The Review Committee is responsible for:

- reviewing inquiry reports and determining whether a breach of this Policy has been established;
- deciding on appropriate organisational, protective, corrective, contractual, or disciplinary measures in accordance with this Policy;
- ensuring that decisions are proportionate, evidence-based, and consistent with GEF's safeguarding and legal obligations;
- hearing the Complainant and/or the Subject of Complaint before a final decision is taken, where appropriate;
- inviting external investigators to present or clarify their findings, methodology, recommendations, or conclusions where the Panel considers this necessary;
- determining and reviewing interim measures where required to protect individuals and the integrity of the inquiry process;
- ensuring that conflicts of interest are identified and managed appropriately throughout the decision-making process;

- acting as the inquiry body in cases where the CCP and the designated Board Member responsible for anti-harassment determine that an external inquiry is not necessary and where the Complainant agrees to this approach;
- ensuring that any inquiry conducted directly by the Panel respects the principles of independence, impartiality, confidentiality, due process, and survivor-centred practice established under this Policy.

External Investigators

External investigators appointed under this Policy shall:

- conduct inquiries independently, impartially and confidentially;
- follow trauma-informed and survivor-centred approaches;
- gather and assess evidence objectively;
- prepare inquiry reports containing findings and recommendations;
- avoid conflicts of interest and maintain professional independence throughout the inquiry process.

Partners, Contractors and Service Providers

Partners and other external collaborators engaged in GEF-funded or GEF-led activities must:

- comply with the principles and standards contained in this Policy;
- contribute to safe, respectful and inclusive environments;
- cooperate with complaint and inquiry procedures where relevant;
- take appropriate action when concerns arise within activities under their responsibility;
- inform GEF of serious safeguarding, discrimination or harassment concerns affecting GEF-related activities.

• **5.2 Prevention Measures**

GEF is committed to preventing Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH) through proactive, ongoing and organisation-wide measures. Prevention is a shared responsibility and forms an integral part of GEF's commitment to maintaining safe, inclusive and respectful environments.

Recruitment and Employment Practices: GEF will seek to eliminate barriers and reduce the risk of discrimination throughout recruitment and employment processes. Recruitment materials shall use gender-inclusive and accessible language, selection procedures shall be based on transparent and objective criteria, and recruitment outcomes shall be periodically reviewed to identify potential inequalities or unintended bias.

Awareness Raising and Training: GEF shall provide regular training on gender equality, non-discrimination, harassment prevention, power dynamics, consent and reporting mechanisms.

Individuals involved in complaint handling shall receive additional training on survivor-centred and trauma-informed approaches.

Safe and Inclusive Organisational Culture: GEF is committed to fostering a culture grounded in dignity, respect, accountability, care, solidarity and inclusion. Particular attention shall be given to addressing power imbalances, supporting underrepresented voices and ensuring that concerns can be raised safely and without fear of retaliation.

Events and Programme Activities: GEF shall take reasonable measures to promote safety, accessibility and inclusion in events and programmes, including communicating behavioural expectations, designating Safe Persons where appropriate and considering accessibility needs and caring responsibilities when planning activities.

Partnerships and External Engagement: GEF expects partners, contractors and service providers to uphold standards consistent with this Policy. Relevant safeguarding and anti-harassment expectations may be reflected in partnership agreements and contractual arrangements.

Reporting, Visibility and Access to Support: GEF shall ensure that reporting mechanisms, contact points and support resources remain accessible, visible and clearly communicated to all persons covered by this Policy.

Monitoring and Continuous Improvement: GEF shall periodically assess the effectiveness of prevention measures, review lessons learned and strengthen organisational practices where necessary. Implementation of this Policy shall be monitored annually through GEF's Annual Action Plan and related wellbeing and safeguarding reporting mechanisms. A comprehensive review of the Policy shall take place at least every three years, or sooner where legal, organisational, or operational developments so require.

The complaint procedure

GEF is committed to maintaining an environment where all individuals feel safe to raise concerns related to Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH), whether they have experienced such behaviour directly or have witnessed it.

All complaints and concerns raised under this Policy will be handled promptly, fairly, confidentially, and in accordance with GEF's survivor-centered approach. Individuals who report concerns, participate in an inquiry, or support a complainant will not be subject to retaliation or any form of disadvantage as a result of doing so.

GEF recognises that individuals may face barriers to reporting, including concerns linked to power dynamics, professional relationships, dependency, identity, or fear of negative consequences. GEF therefore commits to ensuring that reporting mechanisms are accessible, clearly communicated, and responsive to the needs of different individuals.

6.1 How to file a complaint or report a concern

Any person covered under the scope of this Policy (point 1. Scope and Purpose) may raise a concern or submit a complaint regarding behaviour prohibited under this Policy. Concerns may also be raised by witnesses or third parties who become aware of possible misconduct.

Individuals are encouraged to provide any relevant information available, including details regarding the incident, persons involved, dates, locations, or supporting information. However, the absence of documentation or evidence should not prevent a concern from being raised.

Once a concern is raised, the person reporting the concern is referred to as the **Complainant**. The person against whom the concern is raised is referred to as the **Subject of Complaint (SoC)**. The **Complainant** may be the **Survivor** of the alleged behaviour or may raise a concern on behalf of another person, where appropriate.

• 6.1.1 Confidential Contact Person (CCP)

The Confidential Contact Person (CCP) is the first point of contact for individuals seeking information, support, or guidance regarding concerns under this Policy.

Contacting the CCP does not automatically initiate a formal complaint procedure. The CCP will respect the wishes and autonomy of the individual seeking support, while also explaining any situations where GEF may have legal obligations to take further action.

Discussions with the CCP are confidential. Information identifying individuals involved will not be shared without informed consent, except where required by law, where there is a serious and immediate risk of harm, or where safeguarding obligations apply.

The CCP does not conduct investigations, determine responsibility, provide legal advice, or replace professional psychological support services.

The CCP may, where appropriate and with the agreement of the individual concerned, facilitate access to further support mechanisms, mediation, external expertise, or a formal inquiry procedure.

GEF Confidential Contact Person:

- Name: Giuseppina Tucci
- Email: giuseppina.tucci@gef.eu
- Phone number: +32 485 177205

Board Member responsible for prevention of Gender Based Violence and Harassment:

- Name: Paz Serra Portilla
- Email: pazserra@proton.me

A complaint can be filed via this [Complaint form](#)

Where the Complainant wishes to remain anonymous, GEF will make every effort to maintain confidentiality throughout the complaint process. Information that identifies individuals involved in a complaint will be limited to personnel with the absolute need to have such information and will not be shared further without obtaining the informed consent of the Complainant, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. In case a Complainant wishes GEF to conduct a formal inquiry, anonymity should be lifted to be able to conduct the inquiry.

While GEF will respect a complainant's wish to remain anonymous wherever possible, there may be exceptional circumstances where information received through an anonymous complaint indicates a serious risk to the safety, well-being, or rights of other individuals, or reveals conduct that may constitute a serious breach of this Policy or a legal obligation. In such cases, the CCP, in consultation with the Director and, where appropriate, legal counsel, may decide to escalate the matter and initiate protective, safeguarding, or reporting measures even where the complainant does not consent to lifting their anonymity. Any action taken shall be proportionate, limited to what is strictly necessary to address the identified risk, and carried out in a manner that seeks to preserve the complainant's anonymity to the greatest extent possible.

Where legally required disclosure is necessary, GEF will seek legal guidance where appropriate and ensure that action is taken in a manner that prioritises safety. Non-identifying information may be shared in line with organisational reporting requirements.

All persons involved in handling complaints will be informed of their confidentiality obligations and may be required to sign confidentiality agreements. Failure to respect confidentiality may result in disciplinary or restrictive measures.

• **6.1.2 Internal Complaint Procedure**

The internal complaint procedure describes the process followed after the CCP receives a concern.

A complaint procedure may move forward where:

- there is an indication that this Policy may have been breached;
- it is considered in the best interests of the survivor to proceed;
- proceeding with an inquiry will not expose the survivor to additional risk or harm;
- the survivor has received a clear and transparent explanation of the process, possible outcomes, and potential consequences.

• 6.1.3 Complaints and pathways

Any staff member covered by Belgian employment law who considers themselves affected may contact the CCP or the Prevention Adviser. Within ten calendar days of first contact, the CCP or Prevention Adviser will hear the person and inform them of the available intervention options, in line with article 13 of the Royal Decree of 10 April 2014.

Following an initial assessment by the CCP, several pathways may be considered depending on the nature of the concern, the wishes of the Complainant, and the level of risk identified.

A) Where the situation does not require a formal inquiry, the CCP may provide information, support, and guidance on possible solutions.

B) Where the concern relates primarily to workplace conflict, management issues, or other employment-related matters, GEF may refer the matter to the appropriate internal process, while ensuring that concerns related to harassment or discrimination are addressed under this Policy where relevant.

C) Where the concern may constitute Gender-Based Discrimination, harassment, sexual harassment, sexual exploitation, sexual abuse, or other serious misconduct, the Complainant may request the launch of a formal inquiry.

D) In addition to the pathways described above, a staff member covered by Belgian employment law may, pursuant to Articles 10 et seq. of the Royal Decree of 10 April 2014 on the prevention of psychosocial risks at work, submit a request for informal or formal psychosocial intervention to the CCP or the Prevention Adviser for Psychosocial Aspects:

a. Request for informal psychosocial intervention

Informal psychosocial intervention involves the CCP or Prevention Adviser working with the person concerned to seek an informal resolution, which may include supportive conversations, an intervention with a member of the hierarchical line, or a facilitated reconciliation between the parties where all agree.

The type of informal intervention chosen shall be recorded in a dated document, signed by both the intervening party and the person concerned, of which the latter receives a copy.

b. Request for formal psychosocial intervention

A formal request for psychosocial intervention is a request to the employer to take appropriate individual and collective measures, based on an analysis of the work situation and the recommendations of the Prevention Adviser as set out in a written opinion.

Where a staff member does not wish to pursue informal intervention, or where informal intervention has not resolved the matter, the staff member may express their intention to submit such a formal request to the Prevention Adviser for Psychosocial Aspects.

A mandatory individual meeting between the staff member and the Prevention Adviser must take place within ten calendar days of the staff member's expression of intent. Both parties are responsible for ensuring this deadline is met. The Prevention Adviser shall confirm in writing that the meeting has taken place and shall provide a copy to the staff member.

The Prevention Adviser will follow the procedure prescribed by Belgian law, which is separate from but complementary to the internal complaint procedure described in this Policy. GEF will ensure coordination between the CCP and the Prevention Adviser to avoid duplication and protect the well-being of all parties involved. The CCP will explain:

- the purpose and process of the inquiry;
- confidentiality arrangements;
- the rights and responsibilities of all parties;
- possible outcomes and measures.

Where anonymity has been requested, the CCP will explain the implications of maintaining anonymity, including where lifting anonymity may be necessary for a formal inquiry to proceed.

In cases where the Complainant is not the Victim and the Victim wishes go against the wishes of the Complainant, a formal inquiry requiring the disclosure of the identity of the Victim will not be put in place.

6.2 Inquiry process

For the purposes of this Policy, an inquiry is a fact-finding process involving the collection, review, and assessment of information in order to establish the facts of a complaint. An inquiry forms part of a decision-making process that begins with a complaint and ends with an outcome.

GEF is committed to ensuring that inquiries are conducted independently, impartially, confidentially, and in accordance with principles of due process.

• 6.2.1 Process Overview

The inquiry aims to establish the facts of the case, determine the nature, severity and impact of the complaint and may lead to disciplinary or restrictive measures.

Internal inquiries are independent from and can be carried out also in case the situation has or will be reported to the relevant national authorities for legal action.

GEF seeks to discuss and obtain informed consent, ensuring that the Complainant understand the investigation's mandate and limitations, what information is being sought, how it will be used and stored, confidentiality measures, what risks participation may involve, and what will happen when the findings are published and after the inquiry process ends

For the duration of the inquiry the CCP will serve as a reference person, and can arrange specific support for the complainant including by finding psychological support if requested.

The inquiry process may include:

- A written complaint / Detailed complaint form;
- interviews with the Complainant;
- interviews with the Subject of Complaint;
- interviews with relevant witnesses;
- review of relevant documentation or evidence.

Following a full explanation of the inquiry process and its potential implications, the Review Committee and external investigators will seek the Complainant's informed consent to proceed with the inquiry. Consent will be recorded in writing.

The Complainant may withdraw their consent to participate in the inquiry at any stage. Where consent is withdrawn, the inquiry team, in consultation with the Review Committee, will assess whether the inquiry should be suspended, closed, or continue.

As soon as an inquiry has been launched, the CCP must inform the Subject of Concern in the complaint of the launch of the inquiry. Only the name of the complainant and person concerned in the complaint in the procedure are given, together with the information that an inquiry is happening, with no further details on the content of the procedure.

The findings of an inquiry will inform GEF's response to the complaint and any subsequent organisational measures. Where a breach of this Policy is substantiated, GEF's Review Committee – chaired by the CCP – may implement appropriate protective, corrective, contractual, or disciplinary measures, taking into account the nature and severity of the conduct, the level of risk, any mitigating or aggravating circumstances, and GEF's legal and safeguarding obligations. Further details regarding the possible outcomes of an inquiry are set out in point 6.5 Inquiry Outcomes and Organisational Measures.

The participation of other stakeholders within GEF is not foreseen in the process. However, the Director, the Board or other Staff Members may be involved as part of the Review Committee depending on the type of inquiry and/or the wishes of the Survivor. Once produced, the CCP proceeds to anonymising the report and compiling information such as the nature of concerns raised, actions taken, lessons learned, and recommendations for strengthening prevention and response measures to be shared with the Board in their Annual Reporting.

• **6.2.2 Persons Covered by the Inquiry**

An inquiry can be launched for any person belonging to the categories mentioned in point 1. Scope and Purpose, concerning a situation of possible Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH) that concerns them directly. Where relevant, the ability to raise a complaint may continue after the end of a person's contract or engagement, provided that the Subject of Complaint remains within GEF's scope of responsibility at the start of the inquiry.

• 6.2.3 Inquiry Team

GEF might appoint an external investigator, or a team of appropriately qualified external experts, depending on the nature, complexity, and sensitivity of the case. GEF aims for the inquiry team to be gender-balanced and composed of at least two appropriately qualified individuals.

Additional expertise may be included where required, including:

- IT specialists for gathering electronic evidence;
- psychosocial support professionals;
- child protection experts where children are involved.

The composition of the inquiry team will depend on the requirements of the case, available resources, and the context in which the alleged behaviour occurred. The Review Committee can act as an inquiry team in cases where the CCP and the Board Members responsible agree.

The inquiry team shall act independently and shall not receive instructions from third parties regarding the conduct or outcome of the inquiry.

The inquiry shall be carried out confidentially, according to the level of anonymity agreed upon by the Complainant and CCP.

• 6.2.4 Evidence and Documentation

All inquiries shall be conducted impartially while respecting confidentiality obligations.

GEF commits to applying trauma-informed interviewing approaches, recognising that experiences of harm and trauma may affect memory, communication, and participation.

Interview processes will allow individuals to share information at their own pace, while ensuring that signs of distress are recognised and responded to appropriately.

Both the Complainant and Subject of Complaint will have the opportunity to provide information and respond to relevant allegations.

Both parties may request that relevant witnesses are considered as part of the inquiry.

Both parties may be accompanied by a support person during interviews, provided that this person is not involved in the inquiry process or a potential witness.

For each inquiry, a detailed inquiry protocol will be adopted or developed by the appointed external investigators describing the process, including interview arrangements, treatment of witness statements, and handling relevant information. The inquiry protocol will be made available to all parties concerned before the start of evidence collection, documentation, and interviews.

• 6.2.5 Duration

GEF will aim to conclude all inquiry procedures within 6 months of the formal complaint submission. However, no two investigations are alike; the amount of time and resources required for each may vary for each investigation.

For persons covered by Belgian employment law who have submitted a formal request for psychosocial intervention, the Prevention Adviser for Psychosocial Aspects is legally required to submit a reasoned opinion to GEF within 3 months of accepting the request.

• 6.2.6 Communication

Effective communication is an essential component of a fair, transparent, and survivor-centred inquiry process. Throughout the inquiry, GEF and the appointed external investigators will ensure that communication is timely, respectful, and proportionate to the nature, complexity, and scale of the inquiry.

The investigator(s) will arrange a meeting to introduce the inquiry team, explain their independent role and responsibilities, outline the inquiry process, and provide an opportunity for the Complainant to ask questions before deciding whether to proceed.

During this initial communication, the investigator(s) will explain:

- the purpose and scope of the inquiry;
- the roles and responsibilities of the inquiry team;
- the Inquiry Protocol governing the inquiry process;
- how evidence will be collected, documented, and stored;
- confidentiality arrangements and any limits to confidentiality;
- the rights and responsibilities of all parties involved;
- the possible outcomes of the inquiry and the subsequent decision-making process;
- the expected timeframe for the inquiry, recognising that this may vary depending on the complexity and scale of the case.

Communication throughout the inquiry shall be conducted in accordance with the survivor-centred principles outlined in this Policy. Investigators will recognise that experiences of trauma may affect an individual's communication, participation, and decision-making, and will seek to conduct all interactions in a manner that promotes safety, dignity, respect, and informed participation.

6.3 Interim measures

Interim measures may be taken at any stage after a concern has been raised or after the launch of a formal inquiry, where necessary to protect the individuals involved, prevent further harm, prevent retaliation, or ensure that the inquiry can proceed without interference.

GEF commits to ensuring that interim measures do not result in retaliation, disadvantage, or unjust treatment of any person who raises a concern, participates in an inquiry, or supports another individual through the process.

Interim measures will be reviewed regularly and adapted or removed when no longer necessary.

For persons covered by Belgian employment law, interim protective measures may additionally arise from the statutory psychosocial intervention procedure. Under the Royal Decree of 10 April 2014, where the severity of the situation so requires, the Prevention Adviser for Psychosocial Aspects may recommend urgent protective measures to GEF as employer prior to the completion of the formal procedure. GEF shall respond to such recommendations within a reasonable time and shall inform the Prevention Adviser accordingly. Any measures implemented on the basis of such recommendations shall be coordinated with interim measures determined by the Review Committee under this Policy, in order to avoid duplication and ensure coherence.

• 6.3.1 Purpose

The purpose of interim measures is to:

- prevent the recurrence of the reported behaviour;
- protect the Complainant, Survivor, witnesses, and other relevant individuals from retaliation or further harm;
- prevent interference with the inquiry process;
- ensure a safe and respectful environment for all individuals involved.

Interim measures are protective in nature and do not represent a finding of responsibility or a conclusion regarding the outcome of the inquiry.

Any measures taken should prioritise the safety, dignity, and well-being of the Complainant and witnesses, while also respecting the rights and procedural fairness of all parties involved.

Interim measures should be proportionate, limited in duration, and assessed on a case-by-case basis by the Review Committee and, where appropriate, the Complainant.

• 6.3.2 Measures Overview

Depending on the circumstances of the case, possible interim measures may include, but are not limited to:

- adjusting reporting lines or working arrangements;
- temporarily modifying professional interactions between individuals involved;
- limiting participation in specific meetings, activities, events, missions, or other GEF-related engagements;
- implementing temporary changes to responsibilities or access to certain organisational spaces or resources;

temporary reassignment of duties where necessary to ensure safety and prevent further harm.

6.4 Inquiry Report and Subsequent Measures

• 6.4.1 Inquiry Report Overview

At the conclusion of the inquiry, the external investigators shall prepare a written inquiry report documenting the investigation undertaken, the evidence reviewed, the findings reached, and any recommendations arising from the inquiry.

The inquiry report serves to document the fact-finding process and provide the Review Committee with an objective assessment of whether the conduct examined may constitute a breach of this Policy, including the prohibited behaviours. Where appropriate, the report may also identify related conduct or organisational issues that should be considered in order to prevent future harm or strengthen safeguarding measures.

The report does not itself determine disciplinary or organisational measures. Rather, it provides the factual basis upon which the Review Committee may determine appropriate follow-up actions in accordance with this Policy.

The inquiry is considered complete once the final inquiry report has been formally submitted.

• 6.4.2 Report Confidentiality

Inquiry reports contain highly sensitive information and shall be treated as strictly confidential.

Access to the report shall be restricted to those individuals with a legitimate need to know in order to fulfil their responsibilities under this Policy and in accordance with the confidentiality principles outlined in point 6.1.2. Confidentiality.

The report, or information contained within it, shall only be disclosed where:

- disclosure is required by law;
- there is evidence that a criminal offence may have been committed and the matter is referred to the competent authorities;
- disclosure is necessary for disciplinary, contractual, or other organisational procedures arising from the inquiry;
- disclosure is otherwise authorised in accordance with applicable legal obligations.

• 6.4.3 Findings and Recommendations

For each allegation considered during the inquiry, the inquiry report shall present the investigator's findings together with the reasoning supporting those findings.

Using the evidence gathered, each allegation will normally be assessed as one of the following:

Substantiated – there is sufficient evidence to conclude, on the balance of probabilities, that the alleged conduct occurred.

Unsubstantiated – the available evidence does not support a finding that the alleged conduct occurred, or demonstrates that the alleged conduct did not occur.

Inconclusive – the available evidence is insufficient to determine whether the allegation can be substantiated or unsubstantiated.

The report may also include recommendations aimed at addressing organisational risks, improving safeguarding practices, strengthening preventive measures, or reducing the likelihood of similar incidents occurring in the future.

- **6.4.4 Inquiry Report Reception**

The completed inquiry report shall be submitted to the Review Committee.

Where appropriate, the external investigators may provide a confidential debriefing to the designated recipients to explain the inquiry process, methodology, findings, and recommendations.

Before any organisational decision is taken, the Complainant and the Subject of Complaint may each be given the opportunity to be heard individually by the Review Committee. Where appropriate and consistent with confidentiality obligations, both parties may receive a confidential summary of the findings relevant to them.

The Review Committee shall consider the inquiry report together with any relevant information permitted under this Policy before determining whether organisational, contractual, disciplinary, or other protective measures are appropriate.

Any decision shall be based primarily on the findings and recommendations contained within the inquiry report. Where relevant, the Review Committee may also consider previous substantiated incidents, recurring patterns of behaviour, or repeated breaches of this Policy.

- **6.4.5 Communication of the Outcome**

Following a decision by the Review Committee, the Complainant and the Subject of Complaint shall each be informed, on a confidential basis, of the outcome of the process to the extent permitted by legal, employment, confidentiality, and data protection obligations.

Where appropriate, other individuals or organisations directly affected by the outcome may also be informed where necessary to implement the decision or fulfil legal obligations.

6.5 Inquiry Outcomes and Organisational Measures.

Measures shall be proportionate to the findings of the inquiry and may be applied individually or in combination, depending on the circumstances of the case.

Protective Measures: Where necessary to safeguard individuals and prevent further harm, the Review Committee may implement protective measures, including but not limited to:

- restricting or prohibiting contact between the parties;
- restricting participation in meetings, projects, missions, or GEF activities;
- prohibiting attendance at GEF events or other activities;
- restricting access to GEF premises, digital platforms, or organisational resources;
- temporary or permanent removal from specific roles or responsibilities where necessary to protect individuals or the integrity of GEF activities.
- reassignment of duties or responsibilities;
- changes to reporting lines or working arrangements;

Corrective Measures: Where appropriate, the Review Committee may determine that corrective measures are sufficient to address the behaviour and reduce the likelihood of recurrence, including but not limited to:

- mandatory participation in training or awareness programmes;
- professional coaching or supervision;
- behavioural improvement plans;
- facilitated dialogue or mediation where appropriate;
- written commitments regarding future conduct.

Mediation shall only be considered where it is appropriate to the circumstances, where both parties freely and informedly consent, and where there is no significant power imbalance, safeguarding concern, or risk of further harm. The suitability of a case for mediation shall be assessed jointly by the CCP and the Review Committee, taking into account the nature of the allegations, the wishes of the parties, and GEF's safeguarding obligations.

Where both parties agree to mediation, the mediation process should normally commence within thirty calendar days of that agreement and should, where feasible, be concluded within sixty calendar days. Either party may withdraw from mediation at any time. Where mediation is unsuccessful, withdrawn, or deemed no longer appropriate, the matter may proceed through the relevant inquiry or decision-making process under this Policy.

Mediation shall not be used as a substitute for responding appropriately to substantiated cases of sexual abuse, sexual exploitation, sexual assault, or other forms of serious misconduct.

Contractual and Disciplinary Measures: Where the inquiry establishes that serious misconduct has occurred, GEF may impose contractual or disciplinary measures in accordance with applicable legislation, contractual obligations, and internal procedures, including but not limited to:

- suspension from duties or organisational activities;
- termination of employment;

- termination or non-renewal of consultancy, service, or volunteer agreements;
- removal from governance, advisory, or representative functions, where applicable in accordance with Article 8 of the Statutes.

Any disciplinary or contractual measures affecting persons employed under Belgian law, including in particular the termination of an employment contract for serious cause (ontslag om dringende reden / licenciement pour motif grave), shall be implemented in full compliance with the applicable provisions of the Act of 3 July 1978 on employment contracts and any other applicable Belgian labour legislation. The Review Committee's determinations in such matters constitute recommendations to the competent decision-maker, who shall ensure that all formal legal requirements under Belgian law are met prior to implementation.

Measures Relating to External Parties and Partners: Where the Subject of Complaint is not employed by GEF but participates in GEF activities or represents a partner organisation, GEF may take measures including:

- exclusion from GEF meetings, events, programmes, or activities;
- withdrawal of invitations or accreditation;
- suspension or termination of collaborative activities;
- termination of partnership agreements or contractual relationships;
- withdrawal or suspension of funding, where permitted by contractual arrangements;
- referral of concerns to the relevant partner organisation or competent authority, where appropriate.

Where misconduct concerns a partner organisation, GEF may also require the partner to demonstrate that appropriate safeguarding and disciplinary action has been taken as a condition for maintaining the partnership.

For persons covered by Belgian employment law who have submitted a formal request for psychosocial intervention, GEF as employer shall additionally comply with its statutory obligations following receipt of the Prevention Adviser's written opinion.

6.5.1 Follow-up and Organisational Support

Where the inquiry concludes that no organisational measures are warranted, GEF will nevertheless continue to support a respectful and safe working environment.

Where appropriate, support may be offered to assist in rebuilding professional working relationships, facilitate mediation where suitable, or provide access to additional wellbeing resources.

GEF will remain attentive to the wellbeing of the individuals involved following the conclusion of the inquiry and may conduct appropriate follow-up where considered necessary.

No action may be taken against the complainant and the witnesses unless bad faith on their part can be proven.

6.5.2 Staff Support Measures

Where an inquiry has had a wider impact on a team or working environment, GEF may organise voluntary information or support sessions to assist staff in understanding the complaint process, reinforce expectations regarding respectful behaviour, and promote a safe and inclusive workplace. Such sessions shall not disclose confidential information or identify individuals involved in the inquiry.

6.6 Reporting complaints externally and/or to relevant authorities

• 6.6.1 External Report

GEF's inquiry process is intended to determine whether conduct may constitute a breach of this Policy and to inform appropriate organisational measures. It is distinct from any criminal, civil, regulatory, or administrative investigation undertaken by competent authorities.

Where a complaint may involve conduct that constitutes a criminal offence or otherwise requires notification to a competent authority, GEF will comply with its legal reporting obligations while seeking to apply a survivor-centred approach.

In principle, criminal investigations conducted by competent authorities take precedence over GEF's internal inquiry where there is a risk that an internal process could prejudice or interfere with criminal proceedings.

Where a criminal investigation is underway, GEF may postpone or temporarily suspend its own inquiry following consultation with the relevant authorities and, where appropriate, with the Complainant. In certain circumstances, GEF may decide that a parallel inquiry is appropriate, particularly where organisational safeguarding measures cannot reasonably await the outcome of criminal proceedings. Any parallel inquiry shall be conducted in a manner that does not interfere with criminal investigations and shall not be used to obtain evidence solely for the purposes of criminal prosecution.

GEF recognises that the outcome of a criminal investigation does not necessarily determine the outcome of an internal inquiry. Criminal proceedings generally apply a higher standard of proof than organisational inquiries. Accordingly, conduct that does not result in criminal charges or conviction may nevertheless constitute a breach of this Policy and may result in organisational, contractual, safeguarding, or disciplinary measures.

• 6.6.2 Reporting to Competent Authorities

Where required by law or where necessary to prevent serious harm, GEF may report concerns to the relevant competent authorities.

Examples of situations where external reporting may be required include:

- where there is reason to believe that a criminal offence has been committed;
- where a child is at risk of harm;
- where there is an immediate or ongoing risk to the safety of an individual or others;
- where reporting is required under applicable national legislation.

In Belgium, relevant competent authorities to which concerns may be reported include, depending on the nature of the matter:

- The Supervision of Well-being at Work (Toezicht op het Welzijn op het Werk / Direction générale Contrôle du bien-être au travail), the federal labour inspectorate competent for psychosocial risks and harassment at work;
- The Institute for the Equality of Women and Men (Instituut voor de gelijkheid van vrouwen en mannen / Institut pour l'égalité des femmes et des hommes), for matters of gender discrimination and sexual harassment;
- UNIA (Interfederal Centre for Equal Opportunities), for matters of discrimination based on protected characteristics;
- The competent labour court (arbeidsrechtbank / tribunal du travail), for civil claims relating to harassment or discrimination;
- The police or public prosecutor's office, where the conduct may constitute a criminal offence.

Where GEF is subject to a legal obligation to report, or where there is a serious safeguarding concern or an immediate risk of harm to the Complainant or others, GEF may make a report without the Complainant's consent. Wherever possible and appropriate, the CCP will inform the Complainant before doing so, explain the reasons for the report, and continue to apply a survivor-centred approach throughout the process.

• **6.6.3 Complaints Concerning External Organisations or Partners**

GEF may receive complaints relating to individuals or organisations that are not directly under GEF's authority, including partner organisations, contractors, service providers, networks, or other collaborators.

Where a complaint concerns another organisation, GEF will not ordinarily investigate matters that fall solely within that organisation's responsibility. However, GEF recognises its safeguarding responsibilities and, where appropriate, may:

- encourage or support the Complainant in reporting the concern to the relevant organisation;
- refer the matter to the relevant organisation or competent authority, where lawful, appropriate, and safe to do so;
- cooperate with external safeguarding processes where appropriate;
- assess whether any action is required to protect individuals participating in GEF activities.

Where the complaint concerns a GEF partner organisation, GEF expects the partner to respond promptly, safely, and appropriately in accordance with its own safeguarding or anti-harassment procedures.

Where appropriate, GEF may work collaboratively with the partner to clarify reporting obligations and support an independent investigation.

If GEF determines that a partner organisation has failed to respond appropriately to allegations of Gender-Based Discrimination (GBD) and Sexual Abuse, Exploitation and Harassment (SAEH), or has failed to meet safeguarding expectations, GEF may take appropriate measures. Such measures may include enhanced monitoring, suspension of activities, withdrawal of funding, termination of contractual arrangements, or ending the partnership or collaborative relationship.

Throughout any external reporting process, GEF will continue to apply the principles set out in this Policy, including confidentiality, survivor-centred practice, proportionality, and protection against retaliation.

6.7 Final Measures

• 6.7.1 Data Handling

The personal information GEF requests in the context of this Policy will be processed in line with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation – GDPR), as well as applicable national data protection legislation. As a European political foundation, GEF is considered a data controller within the meaning of Article 4(7) GDPR, in accordance with Article 40(2) of Regulation (EU, Euratom) 2018/2445.

The legal bases for the processing of personal data under this Policy are Article 6(1)(c) GDPR (compliance with a legal obligation) and Article 6(1)(f) GDPR (legitimate interests of GEF as employer), in conjunction with Article 9(2)(b) GDPR for the processing of special categories of personal data where necessary for GEF to fulfil its obligations and exercise its rights in the field of employment and social security law. Data subjects are referred to GEF's Privacy Notice for full information on their rights and the applicable processing activities.

Depending on the Inquiry process, the Review Committee or external investigators shall compile all information linked to the inquiry electronically (including the final report, email exchanges with the two parties, etc.) and file it for a maximum of five years from the opening of the procedure. Files may be retained for another ten year period in case an administrative or legal action is pending.

• 6.7.2 Accessibility and Visibility

GEF shall have a dedicated page on the GEF website highlighting the policy's main elements and contact points. All persons referred to in point 1. Scope and Purpose, shall be regularly informed

about this policy and have access to an internal shared platform with all documentation, contact points and information about additional support linked to this policy.

• 6.7.3 Amendments

The implementation of this Policy shall be monitored annually through GEF's Annual Action Plan and relevant wellbeing reporting. The Policy itself shall be subject to a comprehensive review at least every three years following its adoption, or sooner where required by changes in legislation, organisational practice, identified risks, or lessons learned from implementation.

Non-retaliation

GEF is committed to ensuring that any person who, in good faith, reports concerns, suspected misconduct, breaches of this Policy, unlawful conduct, or other wrongdoing can do so without fear of retaliation, in accordance with the Belgian Act of 7 April 2023 amending the anti-discrimination and well-being legislation, and the Royal Decree of 1 May 2023 concerning protection against retaliatory measures in the framework of the internal procedure. No individual shall be subjected to dismissal, demotion, discrimination, intimidation, harassment, exclusion, reputational harm, or any other adverse treatment for raising a concern, participating in an inquiry, providing information, or supporting another person in the reporting process. Any act of retaliation will be treated as a serious breach of this Policy and may result in disciplinary or other appropriate measures. Protection applies regardless of whether the concern is ultimately substantiated, provided it was raised honestly and with reasonable grounds to believe the information reported was true in line with Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law (Whistleblower Protection Directive)⁶.

⁶ https://commission.europa.eu/topics/human-rights/your-fundamental-rights-eu/protection-whistleblowers_en

