



**EEB**

European  
Environmental  
Bureau

# Policy on the protection from sexual exploitation, abuse and harassment (SEAH) and on safeguarding

As adopted by the EEB Board 16 March 2023



**We are Europe's largest network of environmental citizens' organisations. We bring together 180 civil society organisations from 38 countries. Together, we work for a better future where people and nature thrive together.**

The EEB is an International non-profit association /  
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This **Policy on the Protection from Sexual Exploitation, Abuse and Harassment (SEAH) and on Safeguarding** is based on the [agreed values](#) that guide the EEB: sustainable development, environmental justice, global equity, transparency and participatory democracy. It is a key tool to ensure that EEB continuously lives up to the internal values that guide its operations: democracy, fairness, respect, integrity and sustainability. The EEB promotes a more just and equitable world where everyone feels safe.

## 1 PURPOSE AND SCOPE

- (i) The EEB is committed to providing a safe environment for its staff and representatives and those participating in its activities. The EEB has **zero tolerance for all forms of harm** including but not limited to sexual exploitation, abuse and harassment (SEAH). The EEB strives to show **leadership to accelerate the culture change** needed to ensure a world free from discrimination, harassment and bullying. It recognises the need to **challenge any tacit or explicit acceptance of SEAH** as an essential part of its prevention.
- (ii) The EEB is an international, multicultural and multilingual organisation that strives to ensure best practices in its operations. The **highest standards of conduct and professional ethics** are expected from all those representing the organisation.
- (iii) The EEB will strive to develop a **safeguarding culture** where the rights of people involved in the organisation are prioritised over other considerations. It wants everyone to know who to go to with concerns and that all are confident that they will be listened to and heard without personal or professional repercussions. The duty to safeguard others applies without exception to EEB staff and representatives.
- (i) The EEB directly engages with people at risk such as young people, informal workers or environmental defenders in some instances. The EEB is **committed to its safeguarding obligations** for anyone involved in its activities. It rarely involves children and minors in its activities; however, should the EEB expand its work in a manner that involves, for instance, children and minors or other groups at risk, it will further develop its safeguarding policy.
- (iv) The EEB recognises that it can be distressing for those affected by a sexual harassment disclosure, first and foremost survivors of sexual assault, and this policy aims to ensure that all parties are treated with **dignity and respect** and provided with **appropriate support**.
- (v) The protection from sexual exploitation, abuse and harassment **requires proactive identification and measures taken** against all potential risk of harm. It also requires the establishment of **accountable and transparent systems for reporting and response** should breaches of this policy occur. Safeguarding should be at the heart of these systems, while at the same time protecting the rights of those accused.
- (vi) This policy is **binding on EEB staff, representatives (including consultants, contractors, secondees, interns and volunteers) and members of its governance**

**bodies.** All EEB staff and representatives, regardless of their gender, position or status in the organisation, have a responsibility to prevent sexual harassment, power abuse and bullying, to discourage and report unacceptable behaviour and to comply with the law and this policy.

## 2 DEFINITIONS

- (i) The term “**workplace**” refers not only to the EEB office, but also to locations where work-related tasks are performed such as conference, events, trainings or work-related trips, social activities and telephone conversations and communication through electronic media, as well as cooperation with external service providers.
- (ii) The term “**safeguarding**” means protecting people’s physical and mental health, wellbeing and human rights, and enabling them to live free from harm, abuse and harassment in line with our agreed values. It specifically addresses the need to prevent and respond to harm from any potential, attempted, or de facto abuse of power, trust or vulnerability, especially for sexual purposes. The aim of this safeguarding policy is to protect people, especially children, young people and other at-risk-groups, from harm arising from contact with our staff or participating in the EEB’s activities.
- (iii) **Sexual harassment** is defined as any unwanted conduct of a sexual nature with the purpose or effect that the dignity of the person is being violated, especially when a threatening, hostile, insulting, humiliating or offensive situation is being created.<sup>1</sup> Sexual harassment may involve one or more incidents, and actions constituting harassment may be physical, verbal and/or nonverbal.
- (iv) **Physical:** pinching, stroking, kissing, hugging or inappropriate touching, as well as the use of job-related threats or rewards to solicit sexual favours (such as threatening to have someone fired if they do not go through with it or tell anyone about the assault) are a form of physical harassment.
- (v) **Verbal:** includes sexual comments or comments on a somebody’s private life, appearance, clothes or age, sexually charged jokes or patronising or belittling comments. It can be repeated and could constitute unwanted social invitations for dates and physical intimacy or sending sexually explicit messages without the recipient’s consent. It can be promises or threats, concerning employment or conditions, in exchange for sexual favours. Insults based on the assumed gender or condescending, and paternalistic remarks are a form of verbal harassment.
- (vi) **Non-verbal:** includes sexually suggestive gestures, the display or distribution of sexually explicit or suggestive material, whistling and leering.

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<sup>1</sup> European Institute for Gender Equality “[Belgium – Sexual Harassment](#)” (accessed on 10 June 2022).

- (vii) **Abuse of power** is the misuse of authority to take actions in personal interest that negatively impact on a staff member and person involved in the organisation's activities.
- (viii) **Workplace bullying** is verbal, physical, social or psychological abuse by a superior or manager, another person or group of people at work. It can happen to anyone in the organisation. Bullying can take the forms of, for instance, threats of or actual physical violence, unpleasant or repeated jokes about a person or unfair work loading.

## 3 PREVENTION

To **prevent sexual harassment, power abuse and bullying**, the EEB will take the following measures:

- (i) Make this policy public on the EEB's website.
- (ii) Share it with all new staff members during their induction, make it accessible to all staff members together with other relevant policies and ensure all staff and representatives understand there is zero tolerance towards sexual harassment, power abuse and bullying.
- (iii) Make line-managers aware of their responsibility to prevent any such situation and to address any allegation.
- (iv) Ensure everyone knows how to report an incident.
- (v) Offer trainings to prevent harassment and discrimination where necessary.

To **prevent sexual harassment, power abuse and bullying where the EEB has a safeguarding obligation**, it will take the following measures:

- (i) Design and undertake all activities in a way that protects people from any risks of harm that may arise from contact with the EEB.
- (ii) When entering partnership on projects or activities that involve people at risk ensure that our partnership agreements include safeguards against sexual exploitation, abuse and harassment.
- (iii) Make staff members who work on projects with people at risk aware of their responsibility to identify and mitigate any risks and make sure they receive support and training on safeguarding at a level commensurate with their role.
- (iv) When people at risk, for instance young people, are part of events or travel for EEB activities, make sure the responsible staff assess the risks of sexual harassment, power abuse and bullying around participation and to mitigate any such risk.

To ensure the safeguarding of children and minors, **EEB staff and representatives must not:**

- (i) Engage in sexual activity with anyone under the age of 18 regardless of the age of majority and legal consent in a country. Mistaken belief in the age of a child or minor is not an adequate or acceptable defence.
- (ii) Sexually exploit or abuse children or minors or behave towards a child in a way that is offensive, abusive, sexually provocative, demeaning or culturally inappropriate.
- (iii) Use inappropriate language or behaviour when dealing with children or minors.
- (iv) Recruit or employ anyone below national legislated minimum working age.
- (v) Use children's pictures and information in a way that could put them at risk or publish pictures of children without the written consent of their parents or guardians or take pictures of undressed children.

To ensure the safeguarding of adults at risk, **EEB staff and representatives must not:**

- (vi) Infringe the dignity of an individual by their comments or behaviour or sexually abuse or exploit any adults.
- (vii) Engage in any form of forced or unwanted sexual activity.
- (viii) Take advantage of an imbalance of power to manipulate or coerce another person to engage in sexual activity for the financial, sexual or political benefit of the abuser, including sexual exploitation taking place in person, online or a combination of both.
- (ix) Engage in transactional sex, that is, exchange of money, goods or services for sex, when on duty or linked to any activity of the EEB (e.g., when travelling for the EEB) even in countries where prostitution is legal.
- (x) Engage in any sexual relationships with programme beneficiaries who belong to groups at risk as such a relationship is inherently based on unequal power dynamics.

## 4 REPORTING

- (i) Anyone who has experienced, or witnessed, sexual harassment, power abuse or bullying EEB staff or representative **should report any such instance to the organisation**. The EEB is committed to making sure that all cases are appropriately considered and responded to, and to protect whistle-blowers.
- (ii) If anyone suspects or hears of an **incident regarding a child or minor**, it is mandatory to report the incident.
- (iii) Sexual harassment at the workplace is illegal in Belgium and can **constitute a criminal offence**. Any person who has experienced violence, assault or stalking is encouraged to also report those to the police. The EEB will collaborate with the police in any such instance.
- (iv) Every allegation of harassment, bullying or discrimination will be **immediately, and thoroughly and impartially investigated and addressed**, led or managed by the Secretary General (unless they are the subject of the complaint).
- (v) The person(s) that reportedly suffered from an incident **must consent to further investigation** of the matter unless it might be a criminal act. If the person does not consent to investigation of the matter, the EEB is still obliged to do some minimum investigation if possible.
- (vi) The Secretary General may include other staff members or members of the EEB's Board in the process and will ensure **confidentiality for all parties concerned**, both at the time of reporting and while the complaint is being investigated.
- (vii) EEB commits to ensuring that **no staff member will be victimised or subjected to sanctions for making a complaint in good faith**. It is also committed to ensuring that those involved in the investigation will make no premature assumptions about the guilt or innocence of the alleged harasser.
- (viii) EEB commits to ensuring that **nobody will be victimised or subjected to sanctions for making a complaint in good faith**. It is also committed to ensuring that those involved in the investigation will make no premature assumptions about the guilt or innocence of the alleged harasser.

## 4.1 Complaints by staff

Any affected staff member has **two avenues for complaints: non-formal**, i.e., reporting internally, or a **formal** complaint to the external Prevention Service (a service available to all workers and employees in Belgium).

### 4.1.1 Non-formal complaint (internal reporting)

Staff should report an incident at the first **instance with their line-manager or to the HR team** if the affected staff member feels more comfortable doing so.

Situations of sexual harassment or any situation that may constitute a criminal offense **must be brought to the attention of the Secretary General** (if the affected staff member has given their consent to do so).

### 4.1.2 Formal complaint (reporting to an external Prevention Service)

Staff members are also encouraged to lodge a formal complaint to the **external Prevention Service**, a service established in Belgium, as spelled out in the EEB Terms and Conditions for staff. Staff can apply the formal complaint through the Prevention Service where they prefer not to address the situation with their line-manager, HR and/or the Secretary General, where there is a lack of trust or if any of these people are involved themselves.

## 4.2 Complaints by external persons

Any person from outside the organisation is encouraged to use the [external complaint procedure](#).

# 5 ACCOUNTABILITY

- (i) Depending on the outcome of the impartial investigations, the EEB will take **appropriate disciplinary action or other measures**. The victim or survivor of SEAH will be informed about the measures taken.
- (ii) Disciplinary measures for an **EEB staff member or representative** could include one or more of the following, depending on the severity of the situation: a written warning, the request for an apology to the victim, training, probation or termination of the contract.
- (iii) If found to be a serious abuse, the matter will be **reported to the police** or other statutory authorities for criminal investigation unless to do so would cause the survivor further harm.
- (iv) Where staff members or EEB representatives have experienced alleged sexual misconduct of a **person outside the EEB** (for instance, during a conference or work-related trip), measures may include a written complaint to the alleged perpetrator's organisation or the organiser of an event. The exclusion from events or the termination of collaboration may also be adequate responses to prevent a repetition.
- (v) If the EEB is made aware of allegations of sexual harassment, power abuse, bullying or the lack of safeguards for vulnerable groups in one of its **member organisations or with a project partners**, it will ask for clarification of the situation. It may suspend membership until the member carried out an investigation and takes appropriate steps. If the member or partner organisation is unwilling or unable to address the situation appropriately or there is



proof of misconduct, the EEB may terminate its collaboration, (e.g., joint activities or projects) and initiate the expulsion from the network (in line with its statutes).

- (vi) The EEB will take action against any staff member or representative who seeks to or carries out any **retaliatory action** against complainants, whistle-blowers, survivors, witnesses or those who are handling a complaint, including against the person who is the subject of a complaint. Staff who are found to have done so will be subject to disciplinary action, up to and including termination of employment.
- (vii) If an EEB staff members is found to have made an **allegation that they knew to be false**, they will be subject to disciplinary action, up to and including termination of employment.
- (viii) **Support** will be offered to survivors of abuse such as offering help to seek specialist psycho-social counselling or other appropriate support. Survivors of abuse can choose if they would like to take up the support options available to them.

## 6 ALIGNMENT WITH OTHER POLICIES

This policy will be read together with other EEB organisational policies such as the:

- (i) Diversity, Equality and Inclusion (DEI) Policy
- (ii) Complaints Policy
- (iii) Staff Terms and Conditions

