

Safeguarding Policy

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EPBS is an International Non-Profit Association (AISBL) registered under the Belgian law
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1 **EPBS Management Body 2023 Background and common values**

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3 This policy is an internal document of EPBS and not a substitute for the application of laws
4 and authorities of the host country. This policy is reviewed every other year.

5 In relation to this policy, it is also important that we have a clear set of values and that
6 everyone knows about these common set of values.

7 We want the EPBS community to treat each other with kindness, tolerance and respect. We
8 also recognize each other's different boundaries and cultural differences.

9 We approach each other with interest, empathy and care.

10 If disagreements arise, we start a dialogue with each other based on our own experience
11 and without making accusations.

12 We are aware that everybody sees the world differently - and by acknowledging this, we
13 make room for the fact that we have different levels of acceptance, for example for hugs or
14 jokes.

15 It is the obligation of the individual member states to ensure that the participants who are
16 part of EPBS or participate in EPBS activities are familiar with these set of values.

17 It can be different from person to person, from situation to situation, what is experienced as
18 acceptable behaviour and what is experienced as harassment and other offensive actions.
19 Harassment and other offensive acts are unacceptable and can be difficult to talk about.
20 What is perceived as funny for one person may be offensive for another. Everyone has
21 different boundaries and limits of acceptance.

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23 Therefore, in some cases it can be difficult to identify when there are abusive actions.
24 This means that it must be ok to talk about and speak up when one's own boundaries are
25 crossed, or when you experience or believe that another person's boundaries have been
26 crossed.

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28 Members who report possible irregularities are protected from retaliation and must not be
29 subject to punishment or maltreatment as a result of them having reported possible
30 irregularities. Reporting possible irregularities is important to the EPBS and helps improve
31 the organization.

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34 1. Purpose and objectives of the prevention and response plan

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36 EPBS commits to creating an environment and culture where Students, employees,
37 committee and board members and other parties who perform any kind of work for EPBS or
38 EPBS's member associations (hereinafter referred to as parties) work in a safe environment.
39 Bullying, discrimination, sexual harassment, and any other form of violence (hereinafter
40 referred to as BDSV) is not tolerated under any circumstances by EPBS or its affiliates, and all
41 reported incidents are taken seriously. With this response plan, EPBS and EPBS's member
42 associations want to ensure the psychosocial safety of all the parties. In the case of BDSV,
43 the following response plan must be fully followed.

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45 The aim of this response plan is to ensure that resources are available to promote
46 prevention and procedures in accordance with the 2017/2897 (RSP)¹ on measures against
47 harassment, sexual harassment, discrimination, and violence. In focusing on prevention,
48 emphasis is placed on creating an environment and a culture that increases the well-being of
49 all parties and ensures their psychological safety.

50 EPBS has set the following criteria for BDSV prevention work:

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- 52 • Highlight the importance of well-being of all parties of EPBS at all meetings and point
53 out where the parties can seek help from a professional if they experience any
54 discomfort in relation to their participation at EPBS or if they want to file a complaint.
 - 55 • Review the effectiveness of with the implementation of this policy and the way we
56 handle BDSV case if any.
 - 57 • Include a section on safety and BDSV in formal evaluations of meetings, instance e.g.
58 after a conference, student forum etc.
 - 59 • EPBS and EPBS member associations are responsible for ensuring all relevant parties
60 are familiar about BDSV characteristics, consequences and procedures. This should
61 be renewed every two years or as needed if BDSV issues arise in connection with
62 EPBS activities. The circulation of the policy for review on a two year basis heightens
63 awareness
 - 64 • The EPBS management body must ensure that all involved parties in EPBS are
65 properly equipped with knowledge and tools about psychological safety and the
66 handling of BDSV if it occurs.
 - 67 • While every member of EPBS is bound by this policy the overall responsibility for its
68 implementation rests with the president and vice-president.

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71 2. Definitions

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73 Definitions on measures against harassment, sexual harassment, discrimination and
74 violence:

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- **Bullying:**
Repetitive behaviours that are generally likely to cause distress to the victim, such as belittling, insulting, hurting or threatening the person or causing them fear. Disagreements or differences of interest do not fall under this category.
- **Discrimination:**
The unjust or prejudicial treatment of different categories of people, especially on the grounds of ethnicity, age, sex, or disability. Lack of recognition and understanding of the difference between one thing and another.
- **Sexual Harassment:**
Any sexual behaviour that is unwelcome and has the purpose or effect of disrespecting the person, especially when the behaviour leads to threatening, hostile, degrading, humiliating or abusive situations. The behaviour can be verbal, symbolic and / or physical.
- **Violence:**
Any behaviour that results in, or could lead to, physical or psychological harm or suffering, including threats, coercion or arbitrary deprivation of liberty.
- **Safeguarding officers:**
The EPBS safeguarding officers are persons that is appointed every two years by the General Governing Body (GGB). The safeguarding officers are available to listen, be supportive and outline the options available to individuals and explain the procedure of dealing with allegations of BDSV.
- **Nominated Person:** Individual appointed by the Management Board to lead the investigation into the allegation.

3. Responsibilities and roles of members/management body

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- Know the prevention and response plan in the BDSV issue and follow it when appropriate.
- Ensure access to this prevention and response plan.
- To be aware of the risk factors for BDSV, for example:
 - Management problems
 - Stress and strain
 - Personal problems (health problems, trauma, changes, etc.)
 - Alcohol or drug consumption
- When receiving a BDSV notification/notice, bringing them to the appropriate professionals or local authorities if necessary.
- Support and follow-up with individuals, making a complaint.
- Set a good example.
- Pay attention to one's own behaviour and expressions, taking communication and cultural norms into account.

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116 The Management Body must know and fulfil their obligations under this policy and follow
117 laws and regulations that protect the health and safety of the parties. The Management
118 Body must know and fulfil their obligations under this policy and follow laws and regulations
119 that protect the health and safety of the parties. If BDSV issues arise, the management body
120 must ensure that it investigates whether something in the work environment of EPBS related
121 work is contributing to these issues. The outcome of these investigations should be recorded
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123 EPBS shall provide an opportunity for all members to meet colleagues for joint exchange of
124 thoughts and ideas, about the profession and business. EPBS's common resources should be
125 used responsibly and provide the most possible benefit to the organisation and members.
126 EPBS therefore has a responsible attitude towards the consumption of alcohol. When
127 working for EPBS alcohol consumption during working hours should be avoided. Internally,
128 EPBS may offer beer or wine with the food. Alcohol free alternatives should always be
129 offered in parallel with alcoholic beverage.
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132 **4. Proceedings when BDSV is experienced, noticed or notified**

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134 When processing BDSV cases, it should be emphasized that each case is unique, and it is
135 important that they are viewed as such. Emphasis in case processing may differ depending
136 on the nature and circumstances of the case, but the process is essentially the same. The
137 terms "notified" or noticed shall be used during the procedure.

138 All parties and individuals are entitled to their good name and thus any complaints must be
139 handled with sensitivity.

- 140 ● **Notification/warning**

141 BDSV case can be reported by conversation or in writing to the safeguarding officers email
142 safeguard.officer@epbs.net who receives notifications. The email address is protected by 2
143 step authentication If the incident involves the safeguarding officer/s, the complaint is to be
144 sent to the President of EPBS. It is not necessary for the notifier to have determined whether
145 the act is considered a BDSV case or whether a formal investigation must occur. The
146 safeguarding officer/s receiving the notification must maintain confidentiality with the
147 parties and under no circumstances may they carry out the notifier's duties without their
148 consent.
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150 If the facts of the case concern a person who is not an employee, board member or
151 committee member of EPBS's organizational unit or EPBS's member associations, but the
152 communication takes place in connection with the person's work, the party's notification
153 shall be dealt with in the same way and appropriate proceedings ensured. Appropriate
154 action will be taken during and after the inspection to ensure the safety and well-being of
155 the notifying party.

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All information obtained in connection with the case is treated as confidential and written data is recorded in a safe place under the responsibility of the nominated person. The law on privacy is followed. If the party concerned requests documents in a case, access is granted in accordance with what is permitted by the law on personal data protection.

162 **5. Formal procedure**

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The main purpose of a formal procedure is to investigate whether a notification falls within the definitions of BDSV. If a party requests a formal investigation of an incident/events, the matter is formally notified to the safeguarding officer. Once the notification has been received, the safeguarding officer has become the contact person for the case. The purpose of a contact person is to ensure communication with the parties and to follow formal procedures when processing a case. A party may request that another member or professional can be the contact person.

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In formal proceedings, the following procedures are considered:

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1. Notification of the safeguarding officer.

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Notification is sent to the safeguarding officer (oral or written).

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2. Appointment of the response committee

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The response committee is appointed at the appropriate time after the incident.

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One member of the response committee is a safeguarding officer and the rest are

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nominated by MB. It is recommended that a response committee is a balanced group

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of five people, from different European countries and gender identities.

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3. The rules during the investigation

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All parties involved in BDSV matters within EPBS and EPBS's member associations are

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bound by confidentiality and are not permitted to discuss facts with other parties (if

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it is not relevant to the investigation). The investigation of BDSV cases is a priority for

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the EPBS.

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4. Collection of information

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The report/description of the person reporting the incident and a description of the

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events is reviewed in detail. The parties involved in the incident are invited to give an

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account of the complaint, identify witnesses and other parties they believe can

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provide further information on the facts of the case. The response committee shall in

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all cases gather information in a systematic manner, ensure consistency in its

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approach and keep the parties informed during the entire process. All information is

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confidential, and data is stored securely. Electronic information is stored in

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accordance with current laws on the storage of personal information.

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5. The response committee review

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The response committee reviews the facts of the case and determines whether the

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results meet the criteria of BDSV or whether there is another type of underlying

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problems.

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This procedure is as follows:

- 198 ○ Mapping of a timeline.
- 199 ○ Investigate the complaint.
- 200 ○ Assess whether the information is sufficient to take a position on the
- 201 subject of the complaint.

202 **6. Presentation of reviewed results**

203 The response committee presents the review results to the parties during live/online
204 meetings (preferably in separate meetings). The response committee also gives a
205 recommendation regarding actions to take place as a result of the complaint, which
206 all parties also are informed about.

207 It must always be ensured that the parties receive this information on the same day
208 and that they do not have to meet each other.

209 If the conclusions lead to a BDSV incident, the following actions can be used, taking
210 into account the seriousness of the case:

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- 212 ○ Warning and guidance/professional assistance with the purpose of
- 213 improving behaviour.
- 214 ○ Mediation: Where the matter cannot be resolved locally, both parties will
- 215 be requested to consider the use of mediation and every effort will be
- 216 made to secure their agreement. Mediation is a strictly confidential
- 217 process and requires the voluntary participation and co-operation of both
- 218 parties.
- 219 ○ Formal warning.
- 220 ○ Depending on the nature of the complaint, it may be referred to the
- 221 national organization (for example if it's an incident among an individual's
- 222 country or delegation).
- 223 ○ Appropriate sanctions should be decided. If the results lead to an incident
- 224 not meeting the criteria for BDSV, communication problems are mapped
- 225 and proposals for intervention and improvements are submitted.

226 **7. Follow-up**

227 The parties are provided with follow-up and, if necessary, further processing options
228 are considered. offered, for example psychotherapy or other support/counselling. If
229 a satisfactory resolution is reached the case is deemed closed.

230 If a satisfactory resolution is not reached then an opportunity for a second review of
231 the information is taken, if no new outcome can be reached the case is then closed.

232 **8. The EPBS**

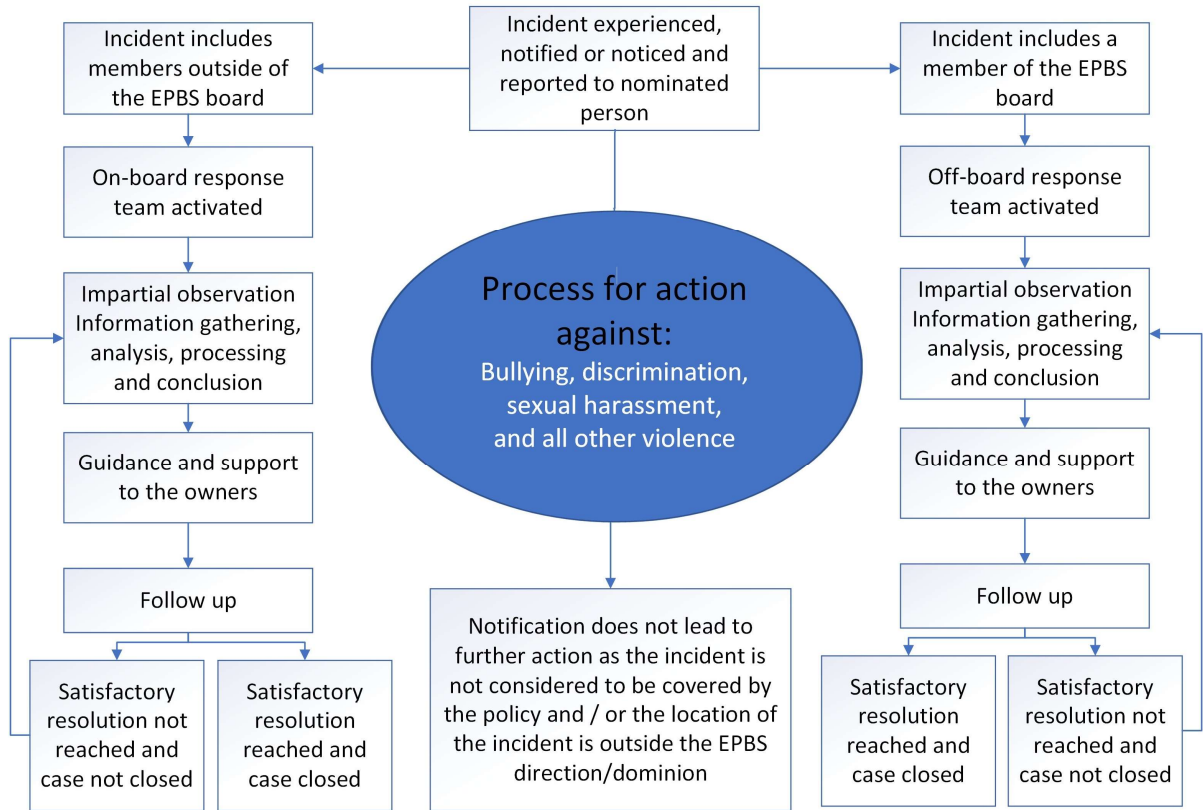
233 Management Body also evaluates the effectiveness of actions and examines whether
234 changes in work practices, organization or other aspects of the organisation are
235 needed to reduce the likelihood of recurrence.

236 The EPBS indemnifies the nominated person against actions related to the
237 management of the investigation of the allegation where they abide with the policies
238 as outlined.

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Process for action against Bullying, discrimination, sexual harassment, and all other violence (BDSV)



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6. Useful links / References

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- EU regulations and directives on harassment: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52017IP0417>
- <https://eige.europa.eu/gender-based-violence/regulatory-and-legal-framework/legal-definitions-in-the-eu>
- [printficheglobal.pdf \(europa.eu\)](#)
- <https://www.hse.ie/eng/staff/resources/hrppg/dignity-at-work-policy-for-the-health-services-summary.pdf>