



Project management tools

Internal ethics, gender, equality and non-discrimination policy

EJUC - Deliverable D1.1

Work package lead – EEB

November 2025

| | |
|-----------------------------|---|
| Project general information | |
| Project name: | Environmental Justice for Unheard Communities |
| Project acronym: | EJUC |
| Call: | CERV-2024-CHAR-LITI |
| Project starting date: | fixed date: 1 September 2025 |
| Project duration: | 24 months |

Content

Introduction

Purpose and scope

Principles

Positive measures

Measures on Gender Equality and Non-discrimination

Measures for Communication and Events

Revision and Improvement

Data Protection

Approval and Endorsement

Complaint Mechanism

Complaint Form

Introduction

This document, which forms part of the EJUC project management tools under WP1, contains the **internal ethics, gender, equality and non-discrimination policy**.

It addresses issues that may arise during the project implementation including conflict of interest, bias, sexual harassment, discrimination, data sharing, health and safety and it pretends to mitigate these potential problems.

The policy responds to the following legal requirements and EU values:

- ✓ Treaty on the European Union (e.g. Article 2)
- ✓ EU Charter of Fundamental Rights (e.g. Article 21)
- ✓ UN Convention on the Rights of Persons with Disabilities (e.g. Article 9, Article 19)
- ✓ Council of Europe Convention on preventing and combating violence against women and domestic violence
- ✓ UN Convention on the Rights of the Child
- ✓ Council Directive 2000/43/EC of 29 June 2000 implementing the principle of equal treatment between persons irrespective of racial or ethnic origin
- ✓ Directive (EU) 2024/1385 of the European Parliament and of the Council of 14 May 2024 on combating violence against women and domestic violence

[Article 21 of the Charter of Fundamental Rights](#)

“Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited”.

[Article 2 Treaty on the European Union](#)

“The Union is founded on the values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail”.

This policy includes a mechanism to submit complaints that can be used, by all individuals involved in any of the activities of all WPs of the project in case of experiencing or observing discriminative treatment.

Purpose and scope

The purpose of this policy is:

- to fight against and prevent any form of discrimination in all activities developed under the EJUC project;
- to promote equal participation in project activities;
- to provide all individuals involved in EJUC project equal opportunities and rights irrespective of their gender or sexual orientation, background, ethnic, colour, religion or beliefs.

This policy applies to all EJUC project activities implemented by the project partners including, all beneficiaries and affiliated entities part of the project consortium, members of the advisory board and other project experts.

The policy will be applied from the moment of the approval of the policy planned during the kick off meeting of the project taking place on 27 November 2025, until the end of the project on 31 August 2027.

The principles and measures laid out shall also guide the project partners interactions during the implementation of this project and when working with other stakeholders identified in this project such as representatives of marginalised and racialised communities, policy makers and media representatives at national and EU level, representatives of Fundamental rights bodies, NGOs, lawyers and other experts.

It is meant to give coherence to the actions under this project ensuring an equitable, diverse, inclusive, fair, just and self-reflective work culture and it should be complementary to other internal policies project partners have in their own organisations.

The EJUC project encourages directly affected individuals as well as those observing discriminative treatment or witnessing violations of this or any other EJUC project policy to lodge a complaint using the complaints mechanism defined for this project.

Each participant joining any of the activities organized under this project, will be informed about the mechanism and channels of submitting complaints at the beginning of events.

Principles

The policy upholds the following principles:

- ✓ **Equality and respect** – All participants, beneficiaries and individuals should enjoy equal rights and access to workshops, events, reports and other results developed under this project. The EJUC project strives to ensure a safe, welcoming and inclusive space for everyone who works for or engages in the activities organised by this project.

- ✓ **Inclusion** – Any organisation, individual, representing the relevant marginalised groups should have equal rights to participate in events, workshops and benefit from outcomes and results of this project.
- ✓ **Non-discrimination** – None of the participants, beneficiaries and individuals involved in the project shall be subject to discrimination, on any ground such as sex, sexual orientation, colour, ethnic or social origin, language, religion or belief, political or any other opinion, membership of a national minority, disability, age or sexual orientation.
- ✓ **Accessibility** - All activities such as workshops, trainings, meetings and conferences should be accessible to people with disabilities.
- ✓ **Gender equity** - Sexual and gender-based violence (SGBV) should not be tolerated in any of the project activities. The project strives for an environment where everyone feels safe to participate and engage without fearing discrimination due to gender identities. Registrations forms of events will include a question to identify special needs of mothers and pregnant women and flexible arrangements will be made when organising community events.
- ✓ **Child rights** – Needs and interest of children (both with or without disabilities) should be fully represented throughout the project duration. An internal child safeguarding policy – which sets minimum safeguarding standards for partners on confidentiality, recruitment, protocols, and risk assessments is also part of the EJUC project and complements this policy.
- ✓ **Intersectionality** - Throughout all activities of the project, representatives of organisations representing different marginalised communities, such as Roma and people with a migrant background should simultaneously be involved. This policy acknowledges that lived experiences differ between groups and individuals and that some people experience multiple forms of oppression.
- ✓ **Privacy and data protection** - Confidential information will be not shared in project reports, and only general observations will be reported back from activities such as in interviews.

Positive measures

EJUC project partners are committed to bringing the principles under this policy into practice during the implementation of this project. The measures cover the organisation of events such as internal and external meetings, workshops, trainings, conferences, research activities, elaboration of reports and internal and external communication.

Measures on Gender Equality and Non-discrimination

All actions of the project will follow the guidance of the European Institute for Gender Equality (EIGE) [Gender Mainstreaming Toolkit](#). The below constitutes a non-exhaustive list of examples of how gender equality and non-discrimination is mainstreamed in the project:

- ✓ Across all WPs, activities will target men, women, non-binary, transgender, marginalised people who might face discriminative treatment on equal basis. These groups might face particular challenges in being able to defend their rights in the scope of environmental justice. Project activities will aim to have a participation of approximately 50% Female 43,75 % Male and 6,25% Non Binary and data will be collected to monitor this indicator.
- ✓ Partner organisations will identify the necessary measures to respond to the needs of mothers, pregnant women, marginalised people who might face discriminative treatment, etc, which includes physical, and others means of accessibility, access to daycare, flexible arrangements in organising workshops, community events, etc.
- ✓ Taking into account the particular challenges that women with children might face as a result of health risks created by environment hazards, activities include specific attention to be paid to the health protection of mothers. It includes a better understanding of needs and challenges that mothers face and identifying the policy responses (e.g. reinforced access to quality health services).
- ✓ The guidance on environmental justice will also include actions to respond to the needs of mothers and people with disabilities ensuring equal access to public services. It will also emphasise the role of gender identity (or sexual orientation) as a potential factor of vulnerability.
- ✓ All beneficiaries, individuals involved in the project across all WPs will have the rights to submit complaints in case of experiencing discriminative treatment. The internal ethics, gender equality and non-discrimination policy will highlight the mechanism of submitting complaints. Each participant will be informed about the mechanism, channels of submitting complaints at the beginning of events.

Measures for Communication and Events

EJUC project partners are committed to ensuring inclusive and non-discriminatory internal and external communication and events. Media reports tend to overreport certain perspectives, for instance, the achievements and activities of men as opposed to other genders. Certain groups tend to be shown more as receivers, or worse, as victims rather than individuals with agency.

- ✓ EJUC strives to use inclusive, gender-sensitive, anti-racist, anti-discriminatory language and imagery and to portray people in their diversity.
- ✓ EJUC events strives to be a safe space for all participants, in particular to those groups who regularly face discrimination or hate speech in public venue.
- ✓ The identified target groups of the project will receive messages adapted to their competences and responsibilities.
- ✓ When organising events, the accessibility of venues will be checked to ensure access for everyone including people with disabilities.

- ✓ The project seeks to give a voice to those who suffer most from the violations of the Charter in environmental matters. References or input from organisations representing marginalised groups will be central in this project.

Revision and Improvement

Feedback from project partners and other stakeholders should contribute to inform future update, revisions and enhancements of this policy, ensuring an adequate response to any raising question, challenges, effectiveness and relevance. The policy shall continuously evolve to address emerging ethical challenges and promote best practices.

Data Protection

Confidential information will be handled in accordance with GDPR regulations, ensuring the privacy and anonymity of individuals participating in interviews and other activities. All references shall be anonymised, direct quotes will be used only with explicit approval from the interviewee.

Summarised observations, findings and conclusions based on the outcomes of the interviews shall be used both in the national and EU reports.

Complaint mechanism

Issues that may arise during the project implementation include conflict of interest, bias, sexual harassment, discrimination, data sharing, health and safety. Individuals or organisations experiencing discrimination, harassment, or other violations of fundamental rights related to this policy are encouraged to report it to designated focal persons and project managers of each partner organisation.

All individuals involved in the project across all WPs will have the right to submit complaints in case of experiencing discriminative treatment.

Project partners have the responsibility to inform participants of any activity about the complaint mechanism including the channels for submitting the complaints.

A specific complaint reporting system shall be established by each partner organisation to address any potential misconduct or discrimination during the project duration. At the same time all complaints submitted to any of the partners should be shared with the Coordinator. Below is the example on how to set up the complaint mechanism in the framework of this project.

Partner organisations should make available a **complaint form in the local language** (see here below the version in EN) to report cases in all activities organised during the EJUC project. All

participants of any project activity should be informed about the possibility of submitting complaints and it should be **part of the registration and evaluation forms of events**.

Principles from the complaint mechanism include:

- ✓ Timely - Complaints will be investigated and responded to in a timely manner.
- ✓ Fair - Each complaint will be addressed in an equitable, objective and unbiased manner through the complaints handling process.
- ✓ Confidentiality – Some complaints need to be kept confidential in order to safeguard those making or involved in the complaint. However, in some instances it might be judged that the complainant will be better served if others are involved in the resolution of a complaint.
- ✓ Responsive – Where investigation shows that actions are required, as a result of complaints, these will be implemented.
- ✓ Feedback – Complainants will be given the opportunity to provide feedback on the response to the complaint.

How to make a complaint

Complaints can be made to any of the focal points (see here below) verbally or in writing. Verbal complaints can be made using the telephone or in person and will be addressed as expediently as possible through a verbal response. If a person making a verbal complaint is not satisfied with the response, the person may follow up with a written complaint. Only written complaints will require a written response and trigger the process described in the following paragraphs. Written complaints can be submitted by post or email.

Complainants should identify themselves within their complaint, stating their full name, organisation if applicable and in which context they have had to deal with the EJUC project.

What information should a complaint include?

Every complaint should include the information requested through the complaint form (see here below). Suggestions about how the problem which is the subject of the complaint might have been avoided or proposals on resolving the issue may also be included.

What happens after a complaint is made?

Complaints will be processed by the local focal point and shared with the project coordinator. The local focal point will work to investigate the circumstances surrounding the issue being complained about and provide a response to it.

In general endeavour to acknowledge all complaints within 14 days of receipt and to inform the complainant of the outcome of its investigation within 30 days of receiving the complaint. In the event that an investigation cannot be completed within this timeframe the complainant will be informed, in writing, about when they can expect a full response.

What should the complainant do in case of dissatisfaction with the response?

In the event of a complainant being dissatisfied with the response from the focal point to their complaint they may appeal in writing contacting the project coordinator. The coordinator will with eventual external advice, consider what action should be taken if any, and will inform the complainant accordingly.

Focal point for each partner organisation

Complaints can be addressed to any of these focal points:

| Name | Organisation | Country | Language | Mail address | E-mail | Mobile nr |
|------------------------|--------------|---------|----------|---|------------------------------------|----------------------|
| Louise Bonneau | BREU | Belgium | EN, FR | Rue Michel Zwaab 20 3, 1080, Molenbeek-Saint-Jean | louise.bonneau@bridge-eu.org | +32 465 626822 |
| Roxana Bucata | 2CELSIUS | Romania | EN, RO | Str. Al. Sahia 18, sc. C, ap. 5, 515600, Cugir, Centru | roxana@2celsius.org | + 43 681 10545624 |
| Lorena Doghi | UCTRR | Romania | EN, RO | Strada Uliului Nr 6, 400289, Cluj Napoca | lorenadoghi@yahoo.com | +40 751 351433 |
| Melinda Mihály | ELTE CERS | Hungary | EN, HU | Toth Kalman Utca 4., 1097, Budapest | mihaly.melinda@krtk.elte.hu | +36 30 957 8198 |
| Ana Barreira | IIDMA | Spain | EN, ES | Calle Garcia De Paredes 76 Duplicado 000, 28010, Madrid | ana.barreira@iidma.org | +34 639 727 464 |
| Valeria Méndez de Vigo | CEPAIM | Spain | EN, ES | Avda. Fabian escribano moreno, 77, 30570, Beniajan | valeriamendezde vigo@cepaim.org | +34 667 689769 |
| Ruben Romero Masegosa | | | | | romero@cepaim.org | +34 678420396 |
| Csaba Kiss | EMLA | Hungary | EN, HU | Garay u. 29-31. I.em.1, 1076, Budapest | drkiss@emla.hu | +36 132 28462 |
| Roland Imre | Dzsaj Bhím | Hungary | EN, HU | Szabadság utca 21., 7623, Pecs | imre.roland@ambedkar.hu | +36 303 594055 |

| | | | | | | |
|----------------|----------|--------|--------|---|-----------------------|----------------|
| Sophia Arouche | GHETT'UP | France | EN, FR | 14 rue des Gazomètres, 93200 Saint-Denis | sophia@ghettup. fr | +33 661 477988 |
|----------------|----------|--------|--------|---|-----------------------|----------------|

The complain can be forwarded by the complainant to the following focal point from the coordinator of the project in case the answer is dissatisfied.

| Name | Organisation | Country | Language | Mail address | E-mail | Mobile nr |
|--------------------|--------------|---------|----------|--|--------------------------------|------------------------|
| Patrizia Heidegger | EEB | Belgium | EN, FR | Rue des Deux Eglises 14-16, B-1000 Brussels | patrizia.heidegger @eeb.org | +32 (0)483 12 54 43 |

Approval and Endorsement

All implementing partners must confirm their agreement to adhere to this safeguarding policy.

This policy is approved and endorsed by the consortium and applies to all activities and Work Packages of the EJUC project.

Effective Date: 27 November 2025.

Complaint form

Translation to local languages to be provided by project partners

| Complaint form - EJUC project | |
|--|--|
| Name (optional) | |
| Organisation (optional) | |
| Country | |
| Email | |
| Phone number | |
| Please briefly describe the nature and scope of your complaint, discrimination (date, affected person, community, etc.) maximum 1000 character | |
| Please indicate the organiser of the project activity, event, etc | |
| Please indicate the legal background of your complaint (the law, regulation violated) | |
| Please include any evidence (photo, video, document, etc.) | |
| Please indicate the expected response to your case | |
| Date and submission details (post/email) | |