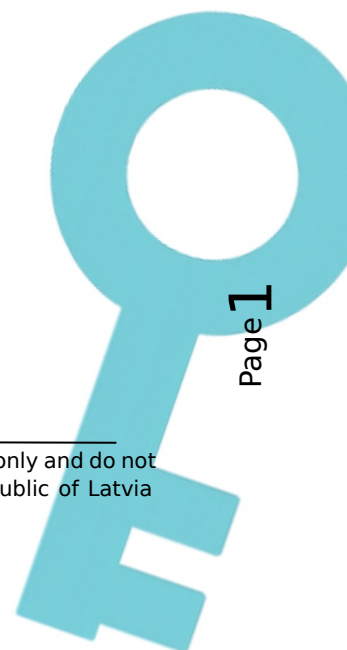


UnlockEquality: Level up your workplace

1. EU Legislation on Organisational Policies & Structures

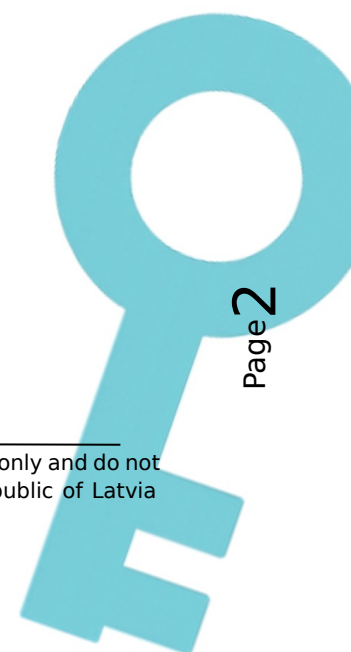
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Contents

1.1 Existence of Core Policies.....	4
1.2 Quality and Clarity of Policies.....	6
1.3 Accessible Reporting Mechanisms.....	8
1.4 Anti-Harassment Frameworks.....	11
1.5 Data Collection & Monitoring Systems.....	14
1.6 Code of Conduct for Senior Staff.....	16
1.7 Governance & Accountability Structures.....	19

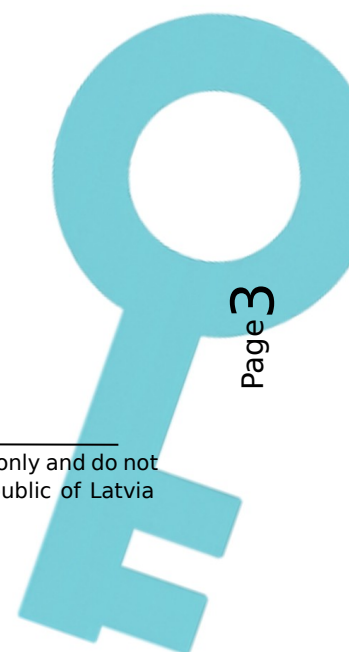




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1.1 Existence of Core Policies

1.1.1.1 Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation

Directive 2000/78/EC establishes a comprehensive EU framework prohibiting direct and indirect discrimination on grounds of religion or belief, disability, age, or sexual orientation in employment and occupation. It also treats harassment as a form of discrimination and prohibits victimisation of employees who raise complaints. The Directive applies to access to employment, vocational training, employment conditions, and promotion across all public and private sector organisations.

1.1.1.2 Connection to Organisational Policies

This Directive directly supports and requires the following policy elements:

- **Written equality and anti-discrimination policies:**
The Directive creates binding intersectional legal obligations — written policies must explicitly cover discrimination on grounds of disability, age, religion, and sexual orientation alongside gender. A policy limited to gender alone is legally incomplete under this framework.
- **Application of policies across all roles and departments:**
Because the Directive's scope covers all employment conditions at every level, policies cannot be applied selectively. Equal treatment obligations bind the organisation in recruitment, daily working conditions, promotion, training access, and dismissal — simultaneously and consistently.
- **Legal compliance with EU equality law:**
Directive 2000/78/EC is one of the primary instruments establishing the non-discrimination baseline that organisational policies must reference explicitly. Compliance documentation should identify this Directive as a governing reference for all intersectional policy provisions.
- **Clear endorsement from senior leadership:**
The Directive implies an active duty to create environments free from discrimination and harassment. Visible leadership commitment is the organisational mechanism through which this duty is operationalised — signalling to all staff that equal treatment is a compliance priority, not merely an aspiration.

1.1.1.3 Official EU Reference

Council Directive 2000/78/EC of 27 November 2000 establishing a general framework for equal treatment in employment and occupation

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0078>

1.1.2.1 Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast)

Directive 2006/54/EC consolidates and strengthens EU legislation on gender equality in employment, prohibiting direct and indirect discrimination on grounds



of sex across the full employment lifecycle — from recruitment and selection through to working conditions, pay, promotion, and dismissal. It explicitly defines harassment and sexual harassment as forms of sex discrimination and includes protections related to pregnancy and maternity. The Directive also requires Member States to designate equality bodies to promote, analyse, and monitor equal treatment.

1.1.2.2 Connection to Organisational Policies

This Directive supports and requires the following policy elements:

- **Written equality and anti-discrimination policies:**
The Directive establishes gender-based non-discrimination as a direct legal obligation. Written policies must define prohibited behaviours, set out employee rights, and outline organisational responsibilities — covering both direct discrimination and indirect discrimination through 'apparently neutral' practices.
- **Application of policies across all roles and departments:**
The Directive's scope covers all aspects of employment conditions — meaning equal treatment obligations apply at every stage and in every part of the organisation. Policies cannot be limited to HR hiring procedures; they must govern everyday working conditions, task allocation, and career development equally.
- **Legal compliance with EU equality law:**
Directive 2006/54/EC is the primary EU instrument on gender equality in employment. Policies must align with its definitions, particularly the distinction between direct and indirect discrimination and the prohibition of harassment and sexual harassment.
- **Clear endorsement from senior leadership:**
The Directive requires employers to take active steps to eliminate discrimination. Senior leadership endorsement transforms a written policy into an operational compliance commitment — providing it with authority, resource, and accountability across the organisation.

1.1.2.3 Official EU Reference

Directive 2006/54/EC of the European Parliament and of the Council of 5 July 2006 on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation (recast)
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>

1.2 Quality and Clarity of Policies

1.2.1.1 Charter of Fundamental Rights of the European Union — Article 21: Non-discrimination

Article 21 of the EU Charter of Fundamental Rights prohibits discrimination on any ground, including 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. The

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Charter applies when EU Member States implement EU law and guides the interpretation of all equality legislation. Together with Articles 1 (Human Dignity) and 23 (Equality between women and men), it establishes the fundamental values that all equality policies must uphold.

1.2.1.2 Connection to Organisational Policies

The Charter's principles directly inform the quality and accessibility of equality policies:

- Use of clear and inclusive language:
The Charter's prohibition of discrimination on multiple intersecting grounds means policies must use language that is inclusive of all protected characteristics. Language that excludes, stigmatises, or is inaccessible to particular groups risks embedding the indirect discrimination the Charter prohibits.
- Actionable behavioural examples included:
Abstract non-discrimination commitments are insufficient if employees cannot understand what they mean in practice. The Charter's values support policies that translate legal principles into concrete expectations — giving employees a clear standard that can be followed and assessed.
- Avoidance of legal jargon:
Because the Charter enshrines fundamental rights applicable to everyone, policies must communicate those rights in universally accessible language. Overly legalistic formulations undermine employee understanding and weaken the practical effectiveness of policy protections.
- Accessible formatting and layout:
Accessibility of information is a prerequisite for equality in practice. A policy that is difficult to locate, navigate, or understand cannot fulfil its protective function — particularly for employees with disabilities, lower literacy, or limited familiarity with formal documents.

1.2.1.3 Official EU Reference

Charter of Fundamental Rights of the European Union (consolidated version)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT>

1.2.2.1 European Institute for Gender Equality (EIGE) — Gender-Sensitive Communication Toolkit and resources

The European Institute for Gender Equality (EIGE) provides practical guidance and tools on gender-sensitive communication for organisations and institutions. Its resources help employers understand how language shapes perceptions of gender, identify and avoid gender-coded or exclusionary terms, and develop communication practices inclusive of all gender identities. EIGE's guidance is grounded in evidence on how language influences workplace culture, stereotype formation, and equal treatment outcomes in practice.

1.2.2.2 Connection to Organisational Policies

EIGE's communication guidance directly informs what 'quality and clarity' means in the context of equality policies:

- 
- Use of clear and inclusive language:
EIGE's guidance specifies what inclusive language means in practice — avoiding gendered default terms, using person-first language, and ensuring policies apply equally to all gender identities. Policy writers should apply EIGE's language recommendations explicitly when drafting or reviewing policy documents.
 - Actionable behavioural examples included:
EIGE emphasises that gender equality communication must move beyond declarations to concrete guidance on acceptable and unacceptable behaviours. Organisational policies should include specific examples drawing on EIGE's definitional frameworks, such as distinctions between harassment, indirect discrimination, and microaggressions.
 - Avoidance of legal jargon:
EIGE supports developing communication strategies that translate legal frameworks into accessible formats. Policies should be reviewed against EIGE's readability and inclusivity standards, ensuring they can be understood and applied by employees at all levels and with diverse linguistic backgrounds.
 - Accessible formatting and layout:
EIGE recommends communicating equality information in multiple formats and through multiple channels. Organisational policies should therefore consider not only the document text but how it is presented, shared, and supported — including visual summaries, manager briefings, and multilingual versions where relevant.

1.2.2.3 Official EU Reference

EIGE — Gender-Sensitive Communication resources and toolkit

<https://eige.europa.eu/gender-mainstreaming/resources/gender-sensitive-communication>

1.3 Accessible Reporting Mechanisms

1.3.1.1 Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law (Whistleblower Protection Directive)

Directive (EU) 2019/1937 establishes a comprehensive EU framework for protecting whistleblowers who report breaches of EU law, including discrimination, harassment, and violations of workplace equality legislation. It requires organisations with 50 or more employees to establish secure, confidential internal reporting channels, acknowledge receipt of reports within seven days, and provide feedback to reporters within three months. The Directive explicitly prohibits retaliation — including dismissal, demotion, blacklisting, and damage to reputation — against those who report in good faith.

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1.3.1.2 Connection to Organisational Policies

This Directive establishes legally binding requirements for internal reporting mechanisms:

- Clearly defined complaint procedure:
The Directive legally mandates written, operational reporting procedures — including designated channels, acknowledgement timelines, and feedback obligations. Even organisations below the 50-employee threshold benefit from implementing equivalent protections as a governance and duty-of-care standard.
- Confidentiality is protected:
The Directive requires that reporter identities be kept confidential unless disclosure is required by law or expressly consented to. Confidentiality must be embedded as a non-negotiable feature of all reporting mechanisms — not merely aspirational — and enforced by appropriate access controls and staff obligations.
- Accessible reporting channels:
The Directive requires 'multiple channels' — both internal and external — and specifies that reporting systems must be 'secure' and 'allow written and oral reporting'. Policy should map available channels clearly and explain how each can be accessed, including by employees who may face barriers.
- Staff are trained on procedures:
The Directive's requirements imply that all staff — particularly those designated to receive reports — must understand their obligations. Policies should specify training requirements and frequencies, and ensure awareness is maintained across all employees through regular communication.

1.3.1.3 Official EU Reference

Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons who report breaches of Union law
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32019L1937>

1.3.2.1 Directive 2006/54/EC — Article 17: Access to judicial and administrative procedures

Article 17 of Directive 2006/54/EC requires Member States to ensure that judicial and/or administrative procedures are available to all persons who consider themselves wronged by failure to apply the principle of equal treatment. The Article ensures that associations or organisations with a legitimate interest may engage in judicial or administrative procedures on behalf of or in support of complainants. It establishes access to remedies as a fundamental right in cases of sex-based discrimination — applicable both through external authorities and internal organisational channels.

1.3.2.2 Connection to Organisational Policies

Article 17 establishes that effective internal procedures are the foundation of access to remedies:

- 
- Clearly defined complaint procedure:
Internal complaint procedures must function as the accessible first remedy — clear, efficient, and capable of reaching resolution before external routes are required. Policies must specify who receives complaints, what the investigation involves, what timelines apply, and how outcomes are communicated.
 - Confidentiality is protected:
Because the Directive protects complainants who pursue formal remedies, organisations have a duty to ensure internal procedures do not expose complainants to retaliation or breach their privacy — protecting the effectiveness of access to remedies at the internal stage.
 - Accessible reporting channels:
The right to access procedures is meaningless without practical accessibility. Channels must be designed to remove barriers — linguistic, physical, digital, or procedural — so that all employees can raise concerns regardless of their role, language, or circumstances.
 - Staff are trained on procedures:
Proper implementation requires that managers and HR staff understand their legal obligations when a complaint is raised, including the requirement not to penalise complainants and to engage with the process in good faith.

1.3.2.3 Official EU Reference

Directive 2006/54/EC — Article 17 (access to remedies)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>

1.3.3.1 ILO Convention No. 190 (2019) concerning the elimination of violence and harassment in the world of work

ILO Convention C190 is the first international labour standard specifically addressing violence and harassment at work. It defines 'violence and harassment' as behaviours, practices, or threats that aim at, result in, or are likely to result in physical, psychological, sexual, or economic harm. The Convention requires ratifying states to adopt laws and policies that prevent and address violence and harassment, establish complaint and enforcement mechanisms, provide remedies and support to victims, and ensure confidentiality in procedures. It applies to all sectors and all workers, and covers conduct in the workplace, during work-related trips, and through digital communications.

1.3.3.2 Connection to Organisational Policies

C190 provides the most comprehensive international standard for accessible and effective reporting mechanisms:

- Clearly defined complaint procedure:
C190 explicitly requires guidance and complaints procedures as part of the organisation's preventive and remedial framework. Policies must specify who receives complaints, what the investigation involves, what timelines apply, and how outcomes are communicated — providing a full procedural map, not merely a general commitment.

- 
- Confidentiality is protected:
C190 requires that procedures 'ensure privacy and confidentiality'. Policies must embed confidentiality throughout — from initial reporting to investigation outcomes — and ensure that all parties understand and observe their obligations under both C190 and GDPR.
 - Accessible reporting channels:
C190's requirement that complaint mechanisms be 'accessible' reflects its broad scope across all types of workers and working arrangements. Reporting systems must be usable by all employees regardless of location, seniority, or digital access — including remote workers and those on non-standard contracts.
 - Staff are trained on procedures:
C190 requires training and awareness-raising as preventive measures. Policies should specify training obligations for all employees and enhanced training for supervisory or investigative roles, with a minimum training frequency and documentation of completion.

1.3.3.3 Official EU Reference

ILO Convention No. 190 (2019) concerning the elimination of violence and harassment in the world of work

[https://www.ilo.org/dyn/normlex/en/f?](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

[p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

1.4 Anti-Harassment Frameworks

1.4.1.1 Directive 2006/54/EC — Article 2(1)(c) and (d): Prohibition of harassment and sexual harassment as forms of sex discrimination

Directive 2006/54/EC defines harassment and sexual harassment as forms of sex discrimination that are expressly prohibited. 'Harassment' means unwanted conduct related to the sex of a person occurring with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating, or offensive environment. 'Sexual harassment' refers to any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the same purpose or effect. Both forms are prohibited regardless of whether the perpetrator intended harm — it is the effect on the recipient that is determinative. The Directive also ensures that victims can seek judicial or administrative redress without prejudicing their employment.

1.4.1.2 Connection to Organisational Policies

This Directive establishes the legal and definitional foundation for anti-harassment frameworks:

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- Harassment clearly defined in policy:
The Directive provides legally binding definitions that organisational policies must incorporate. Policies cannot rely on vague language — they must specify both the behaviours covered and the standard of assessment: effect-based, not intent-based. The definition of 'purpose or effect' is critical and must be communicated clearly to all staff.
 - Complaint and support procedures exist:
The Directive's requirement for access to remedies supports robust internal procedures as the first line of response. Policies must specify how complaints are received, by whom, within what timeframe, and what support is available — including the option for informal resolution before formal procedures are triggered.
 - No retaliation for complaints:
The Directive explicitly prohibits victimisation of individuals who have made complaints or participated in proceedings. The non-retaliation clause must be enforceable — covering dismissal, demotion, and any adverse treatment — and communicated clearly at the point of raising a complaint.
 - Sanctions applied fairly and consistently:
The Directive implies that employers take active steps to eliminate harassment, requiring documented sanctions applied consistently across comparable cases. Policies should specify the range of potential sanctions and require periodic review of outcomes to identify and correct inconsistencies.

1.4.1.3 Official EU Reference

Directive 2006/54/EC — Article 2 (harassment and sexual harassment as sex discrimination)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>

1.4.2.1 Council Directive 2000/78/EC — Article 2(3): Harassment as a form of discrimination on grounds of religion or belief, disability, age or sexual orientation

Article 2(3) of Directive 2000/78/EC treats harassment as a form of discrimination when it relates to religion or belief, disability, age, or sexual orientation. The definition mirrors that of Directive 2006/54/EC — unwanted conduct with the purpose or effect of violating dignity and creating an intimidating, hostile, degrading, humiliating, or offensive environment. This provision ensures that anti-harassment frameworks must extend beyond gender to cover intersectional and multi-ground harassment, which is particularly relevant in diverse workplace environments.

1.4.2.2 Connection to Organisational Policies

Directive 2000/78/EC extends the anti-harassment framework to all protected grounds:

- Harassment clearly defined in policy:
Organisational policies must incorporate the multi-ground scope of Directive 2000/78/EC, explicitly covering harassment related to disability, sexual orientation, religion or belief, and age — alongside gender-based



harassment under Directive 2006/54/EC. A policy that only defines gender harassment is legally incomplete.

- Complaint and support procedures exist:
Because harassment can relate to multiple protected characteristics simultaneously, procedures must handle multi-ground complaints without requiring complainants to categorise the ground of discrimination precisely at the point of reporting.
- No retaliation for complaints:
The Directive's victimisation protection extends to anyone who raises a complaint related to any of its protected grounds. Non-retaliation clauses must explicitly state that protection applies regardless of which characteristic the complaint concerns.
- Sanctions applied fairly and consistently:
Policies should specify that comparable violations receive comparable consequences regardless of the characteristic involved, and that outcomes are reviewed for consistency across grounds and over time.

1.4.2.3 Official EU Reference

Council Directive 2000/78/EC — Article 2(3) (harassment as discrimination)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32000L0078>

1.4.3.1 ILO Convention No. 190 (2019) — Violence and Harassment in the World of Work

ILO Convention C190 provides the most comprehensive international legal framework specifically designed to address violence and harassment at work. It recognises that violence and harassment can constitute human rights violations and requires a comprehensive, gender-responsive, and inclusive approach. The Convention covers physical, psychological, sexual, and economic harm — extending beyond EU directive definitions to include bullying, intimidation, and psychosocial risks. It also explicitly recognises gender-based violence and harassment as a distinct and particularly serious category requiring targeted measures.

1.4.3.2 Connection to Organisational Policies

C190 provides the broadest definitional and procedural framework for anti-harassment governance:

- Harassment clearly defined in policy:
C190's extended definition covers all forms of violence and harassment regardless of perpetrator or context — including third-party conduct (clients, contractors, visitors) and conduct through digital communications. Policies should align with C190's extended definition to ensure comprehensive coverage beyond traditional colleague-to-colleague scenarios.
- Complaint and support procedures exist:
C190 explicitly requires safe reporting channels and supportive measures for victims — including access to legal aid and psychological support. Policies should address the full support pathway from initial disclosure through investigation to aftercare.

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- No retaliation for complaints:
C190 requires protection against retaliation not only for complainants but also for witnesses and support persons. Non-retaliation policies must explicitly extend protection to everyone involved in a reporting or investigation process to encourage witnesses to come forward.
 - Sanctions applied fairly and consistently:
C190 emphasises the need for enforcement including deterrent sanctions as a key element of prevention. Policies should specify that sanctions are proportionate, evidence-based, and applied without favour, with documentation retained for audit purposes.

1.4.3.3 Official EU Reference

ILO Convention No. 190 (2019) concerning the elimination of violence and harassment in the world of work

[https://www.ilo.org/dyn/normlex/en/f?](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

[p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190)

1.5 Data Collection & Monitoring Systems

1.5.1.1 Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms

Directive (EU) 2023/970 introduces binding pay reporting and monitoring obligations designed to detect and correct gender pay gaps across the EU. Organisations with 100 or more employees are required to report annually on gender pay indicators — including the gender pay gap, the proportion of female and male workers receiving bonuses, and the gender composition of quartile pay bands. Employers with an unjustified gender pay gap exceeding 5% must conduct a joint pay assessment with worker representatives and implement a remediation plan.

1.5.1.2 Connection to Organisational Policies

This Directive establishes a statutory baseline for pay equity data collection and monitoring:

- Regular data collection exists:
The Directive establishes a mandatory reporting cycle — creating a legal compliance baseline that organisational data collection systems must meet. For in-scope organisations, data collection is a structured statutory obligation with specific indicators, timelines, and submission requirements.
- Data disaggregated and analysed:
The Directive requires pay data to be broken down by gender and supplemented by contextual analysis where gaps exceed thresholds. Organisations must develop internal analytical capability to assess pay structure, bonus distribution, and representation by pay quartile — all disaggregated by gender.

- 
- Trends reviewed by leadership:
The joint pay assessment mechanism requires engagement at governance level — involving management and worker representatives in reviewing findings and agreeing remedial actions. Monitoring systems must produce leadership-ready reporting at the appropriate cycle frequency.
 - Reports shared transparently:
The Directive requires reporting to be submitted to a designated national body and published, with results communicated to employees, their representatives, and equality bodies. Transparency obligations must be embedded in organisational data governance policies.

1.5.1.3 Official EU Reference

Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023L0970>

1.5.2.1 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data (General Data Protection Regulation — GDPR)

The GDPR governs the collection, storage, processing, and use of personal data throughout the EU. For equality monitoring purposes, Article 9 classifies data revealing racial or ethnic origin, religious belief, disability, and data concerning health or sexual life as 'special categories' requiring explicit legal basis and heightened protection. Processing such data for equality monitoring may be permitted under Article 9(2)(b) (employment law obligations) or Article 9(2)(g) (substantial public interest), subject to appropriate safeguards.

1.5.2.2 Connection to Organisational Policies

The GDPR governs how equality monitoring data is collected, used, and protected:

- Regular data collection exists:
Under the GDPR, all data collection for monitoring purposes must have a documented lawful basis. Organisations must establish and record the legal basis for processing equality-related personal data before implementing monitoring systems — ensuring collection is lawful, purposeful, and proportionate.
- Data disaggregated and analysed:
Where equality monitoring involves special category data, GDPR Article 9 safeguards apply. Disaggregated analysis must be designed to prevent re-identification of individuals in small groups, with technical safeguards such as anonymisation and minimum group size thresholds implemented.
- Trends reviewed by leadership:
Monitoring data processed under the GDPR must be used only for the purpose for which it was collected. Leadership review processes must be designed to use data proportionately, without enabling identification of individuals, and include data governance controls to prevent misuse.

- Reports shared transparently:
The GDPR's transparency principle requires that employees are informed about how their data is used, including for monitoring purposes. Privacy notices should explain what equality data is collected, why, how it is used, and what rights employees have.

1.5.2.3 Official EU Reference

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation — GDPR)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32016R0679>

1.5.3.1 Directive 2006/54/EC — Article 29: Mainstreaming of the principle of equal treatment

Article 29 of Directive 2006/54/EC requires Member States to actively take into account the objective of equality between men and women when formulating and implementing laws, regulations, administrative provisions, policies, and activities. At the organisational level, the mainstreaming principle means that gender equality considerations must be embedded in data systems, management reporting, and decision-making processes — not treated as a separate compliance activity.

1.5.3.2 Connection to Organisational Policies

The mainstreaming principle drives the integration of equality data into core organisational processes:

- Regular data collection exists:
Mainstreaming requires that gender equality is tracked systematically, not only when problems are identified. This implies a proactive, embedded data collection framework within standard HR processes — workforce profiles, recruitment data, training participation, and performance outcomes — all disaggregated by gender as a default.
- Data disaggregated and analysed:
Mainstreaming requires gender disaggregation as standard practice. HRIS systems and reporting templates should produce gender-disaggregated outputs as default, with analysis identifying not only current gaps but trends and patterns over time.
- Trends reviewed by leadership:
Mainstreaming implies that gender equality data is integrated into standard management reporting — reviewed at the same governance level as financial and operational data, on a regular cycle as part of routine performance oversight.
- Reports shared transparently:
Consistent with mainstreaming, transparency about equality outcomes strengthens organisational accountability. Gender equality data should be shared with employees, unions, and equality bodies as appropriate — reinforcing that monitoring is operationally embedded.

1.5.3.3 Official EU Reference

Directive 2006/54/EC — Article 29 (mainstreaming of equal treatment)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>



1.6 Code of Conduct for Senior Staff

1.6.1.1 Charter of Fundamental Rights of the European Union — Article 1: Respect for Human Dignity

Article 1 of the EU Charter of Fundamental Rights establishes that human dignity is inviolable and must be respected and protected. This foundational principle underpins all equality legislation in the EU and sets the ethical standard against which all organisational conduct — including by those in positions of authority — must be measured. Human dignity implies that all workers are entitled to treatment that respects their inherent worth, regardless of their gender, background, identity, or role. Leaders, as the primary shapers of organisational culture, carry a heightened responsibility for upholding this principle in practice.

1.6.1.2 Connection to Organisational Policies

Article 1 provides the foundational ethical rationale for Codes of Conduct for senior staff:

- Code of Conduct exists and is visible:
Article 1's dignity principle provides the ethical grounding for a formal Code of Conduct — translating an inviolable fundamental right into an organisational standard that all staff, and particularly leaders, must uphold. The Code should reference dignity explicitly and articulate the connection between dignified treatment and legal compliance obligations.
- Leadership trained on equity:
A Code of Conduct is only effective if leaders understand its principles and are equipped to apply them. Training must enable leaders to recognise when their conduct falls short of dignity standards — including microaggressions, exclusionary language, or differential treatment — and take corrective action proactively.
- Senior leaders model standards:
Article 1's principle of inviolability means dignity cannot be negotiated or suspended. Leaders modelling respectful, equitable behaviour is not merely good practice — it is the organisational expression of a fundamental right that all employees are entitled to expect in their daily working environment.
- Breaches addressed appropriately:
The inviolable character of human dignity means breaches must not be treated as minor or discretionary matters. Codes of Conduct must specify that violations — regardless of the seniority of the perpetrator — will be investigated and addressed through a clear, fair, and consistent process.

1.6.1.3 Official EU Reference

Charter of Fundamental Rights of the European Union — Article 1 (human dignity)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT>

1.6.2.1 Directive 2006/54/EC of the European Parliament and of the Council — Equal treatment obligations applicable throughout the employment relationship, including to managerial conduct and decision-making

Directive 2006/54/EC applies equal treatment obligations to the full employment relationship — including the conduct of managers and decision-makers in how they supervise, evaluate, assign work, and interact with staff. Because discrimination can be perpetrated by those in authority through decisions on pay, promotion, training access, and working conditions, the Directive implies that those with supervisory responsibility bear a heightened compliance obligation. Organisations cannot discharge their equal treatment duties through policy alone.

1.6.2.2 Connection to Organisational Policies

The Directive's equal treatment framework extends specifically to managerial conduct:

- Code of Conduct exists and is visible:
The Directive's equal treatment framework requires that all agents of the organisation — including senior staff — are bound by its principles. A Code of Conduct operationalises this obligation by specifying the behavioural standards expected of those in decision-making roles, ensuring alignment between the Directive's requirements and the exercise of managerial authority.
- Leadership trained on equity:
The Directive's prohibition of indirect discrimination means leaders must understand not only overt bias but the structural and systemic dimensions of unequal treatment — including how performance assessment criteria, task allocation decisions, and meeting dynamics can embed discriminatory patterns. Training must be tailored to the influence that leaders exercise.
- Senior leaders model standards:
Because the Directive covers working conditions comprehensively, the culture created by senior leaders — including their communication style, openness to challenge, and consistency in applying policy — directly affects whether employees experience equal treatment in practice.
- Breaches addressed appropriately:
When a senior leader's conduct falls short of the Directive's standards, the organisational response must be proportionate, consistent, and documented. Codes of Conduct must specify that seniority does not confer immunity, and governance procedures must address misconduct by those in authority with appropriate oversight.

1.6.2.3 Official EU Reference

Directive 2006/54/EC (equal treatment obligations applicable to managerial conduct)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>

1.6.3.1 European Commission Communication — A Union of Equality: Gender Equality Strategy 2020-2025 (COM(2020) 152 final)

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The European Commission's Gender Equality Strategy 2020–2025 sets out a comprehensive political framework for advancing gender equality across the EU, including in the workplace and in positions of decision-making authority. A key objective is achieving gender balance in leadership and decision-making, recognising that structural inequality is reproduced when leadership is not representative. The Strategy supports the development of inclusive workplace cultures by encouraging organisations to embed gender equality in their governance structures, codes of conduct, and accountability frameworks.

1.6.3.2 Connection to Organisational Policies

The Strategy provides the policy rationale and direction for leadership-level conduct standards:

- Code of Conduct exists and is visible:
The Strategy's focus on institutional culture change supports formalised Codes of Conduct as a governance tool for embedding equality values at the leadership level. A published and visible Code signals organisational commitment and provides a reference point for internal accountability.
- Leadership trained on equity:
The Strategy explicitly supports education and awareness-raising as mechanisms for challenging stereotypes and shifting leadership behaviour. Training for senior staff on gender equality, unconscious bias, and inclusive leadership is directly aligned with the Strategy's approach to sustainable cultural change.
- Senior leaders model standards:
The Strategy's decision-making objective recognises that visible, senior-level commitment to gender equality is both a governance requirement and a cultural signal. When leaders visibly model inclusive behaviour — in meetings, communications, and decisions — they operationalise the Strategy's principles within their sphere of influence.
- Breaches addressed appropriately:
The Strategy's emphasis on enforcement and accountability supports the expectation that Codes of Conduct include clear consequences for breaches — particularly at leadership level, where the reputational, legal, and cultural stakes of non-compliance are highest.

1.6.3.3 Official EU Reference

European Commission — Gender Equality Strategy 2020–2025 (web page)

https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en

EUR-Lex — COM(2020) 152 final (official text)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0152>

1.7 Governance & Accountability Structures

1.7.1.1 Directive 2006/54/EC of the European Parliament and of the Council — Article 20: Equality Bodies

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Article 20 of Directive 2006/54/EC requires Member States to designate one or more bodies responsible for promoting, analysing, monitoring, and supporting equal treatment without discrimination on grounds of sex. While Article 20 addresses national-level equality bodies, it establishes a governance model — designated ownership of equality, independence from line management, and structured accountability mechanisms — that organisations should mirror internally. In Denmark, this function is performed by the Institute for Human Rights (Institut for Menneskerettigheder), providing a reference point for internal governance design.

1.7.1.2 Connection to Organisational Policies

Article 20's institutional model provides a direct template for internal equality governance:

- **Responsible role or team assigned:**
Article 20's model directly supports designating a specific role — such as a diversity officer, equality lead, or designated HR function — responsible for equality policy implementation, monitoring, and reporting. This role should have defined remit, access to relevant data, and visibility with senior leadership.
- **Governance structure supports action:**
The Directive's model of dedicated, independent equality oversight implies that internal governance structures must be capable of escalating concerns without conflict of interest. Organisations should design accountability frameworks that enable the equality function to operate with appropriate authority.
- **Policies regularly reviewed and updated:**
National equality bodies under Article 20 carry responsibilities for ongoing monitoring — not one-time assessment. Organisational governance should similarly include a regular policy review cycle, ensuring that policies remain aligned with current EU directives and national law.
- **Reporting to executive leadership occurs:**
Just as national equality bodies report to governments and legislatures, internal equality functions should have a defined reporting line to the executive level — ensuring equality outcomes are reviewed alongside financial and operational performance, and that corrective action is resourced and authorised.

1.7.1.3 Official EU Reference

Directive 2006/54/EC — Article 20 (equality bodies)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32006L0054>

1.7.2.1 Directive (EU) 2023/970 of the European Parliament and of the Council — Governance, enforcement mechanisms, and joint pay assessment procedures

Directive (EU) 2023/970 introduces structured governance requirements for pay equity compliance — including mandatory reporting cycles, worker information rights, joint pay assessments where unjustified pay gaps exceed thresholds, and access to effective remedies. The joint pay assessment requirement specifically



mandates collaborative governance between employers and worker representatives when pay gaps require remediation, creating a structured internal accountability mechanism with defined timelines and obligations.

1.7.2.2 Connection to Organisational Policies

The Directive's governance requirements translate directly into internal accountability structures:

- Responsible role or team assigned:
The Directive's reporting and assessment requirements imply that organisations must have an internal function responsible for pay data collection, analysis, and compliance — with defined responsibility for accuracy, timeliness, and submission. This governance role requires designated authority and competence.
- Governance structure supports action:
The joint pay assessment mechanism — triggered when an unjustified pay gap exceeds 5% — requires a formal collaborative process involving management and employee representatives. Organisations must design governance structures capable of activating, managing, and documenting this process.
- Policies regularly reviewed and updated:
The Directive's pay reporting cycle creates a structured governance calendar — annual reporting for larger employers. Policies must be reviewed in alignment with reporting periods to ensure continued compliance and responsiveness to emerging pay gaps.
- Reporting to executive leadership occurs:
Because pay gap data must be submitted to national authorities and communicated to employees, governance structures must include leadership sign-off on reports — ensuring executive accountability for pay equity outcomes.

1.7.2.3 Official EU Reference

Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 (pay transparency and governance)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32023L0970>

1.7.3.1 European Commission Communication — A Union of Equality: Gender Equality Strategy 2020-2025 (COM(2020) 152 final)

The Gender Equality Strategy 2020-2025 sets out a framework for systemic change in gender equality governance at both EU and organisational level. It emphasises that gender equality cannot be achieved through isolated measures but requires integrated governance — embedding equality considerations in all decisions, structures, and accountability frameworks. The Strategy supports the development of robust internal governance mechanisms as a precondition for sustainable equality outcomes.

1.7.3.2 Connection to Organisational Policies



The Strategy provides the policy foundation for integrated equality governance across organisational structures:

- Responsible role or team assigned:
The Strategy's approach to institutional governance supports designating specific, empowered roles for equality oversight. These roles must have access to relevant data, a mandate to act, and the authority to recommend corrective measures — not merely to report on compliance status.
- Governance structure supports action:
The Strategy's emphasis on structural change reinforces that equality governance must be embedded in core organisational processes — not added as a peripheral function. Governance structures should integrate equality considerations into standard decision-making cycles.
- Policies regularly reviewed and updated:
The Strategy's ongoing political commitment to advancing equality supports a continuous improvement model — treating equality policies as living documents that evolve in response to monitoring outcomes, legislative changes, and emerging evidence on best practices.
- Reporting to executive leadership occurs:
The Strategy's emphasis on accountability and transparency directly supports executive-level ownership of equality governance. Organisations should establish a regular reporting mechanism to the most senior decision-making body, ensuring equality outcomes are reviewed as a governance priority.

1.7.3.3 Official EU Reference

European Commission — Gender Equality Strategy 2020-2025 (web page)

https://commission.europa.eu/strategy-and-policy/policies/justice-and-fundamental-rights/gender-equality/gender-equality-strategy_en

EUR-Lex — COM(2020) 152 final (official text)

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0152>