

Complaint Structure

Anti-Discrimination Complaint Procedure

Based on this concept, an anti-discriminatory complaint structure will be established, tailored to the needs of an organisation with a compact coordination team and a voluntary.

The aim is to foster a respectful, discrimination-sensitive and supportive working environment and to offer appropriate protection and assistance to individuals affected by discrimination or harassment.

Objectives of the Complaint Management

- Protect and support individuals affected by discrimination.
- Reduce discriminatory behaviour and ensure fair handling of complaints.
- Promote respect, diversity and participation among members, freelancers, employees and board members.
- Strengthen prevention through awareness-raising and knowledge-building.
- Ensure a transparent and agreed-upon step-by-step complaint procedure.

Guiding Principles (see Code of Conduct)

- Respectful interaction: Every person is valued, regardless of origin, gender, age, religion, sexual orientation or any other characteristic.
- Zero tolerance for any form of discrimination.
- Transparency and fairness: All complaints are handled confidentially, independently and in accordance with this structure.
- Confidentiality: Individuals can trust that their concerns will be handled discreetly.

Structure of the Complaint Management

Contact Persons

- Four contact persons are appointed: two board members act as complaint managers, and two or more members act as persons of trust. They are jointly mandated by the board.
- The contact persons should be open for participating in anti-discrimination and diversity trainings (including continued learning opportunities)
- The mandate can be withdrawn if circumstances arise that compromise their ability to act neutrally.
- An external contact point (e.g. anti-discrimination counselling office) may be involved in complex cases or in cases involving board members or internal contact persons, ensuring neutrality (e.g. Germany: THEMIS, Berlin). For international collaborations, consultation may also involve EU-wide advisory services.

Reporting Channels

- In-person conversation with a trusted contact person.
- Written complaint via email, postal mail, or a dedicated online form.
- Anonymous reporting option (via an online tool).

Responsibilities

- Persons of trust receive and handle complaints, hold initial conversations, document incidents and approach the complaint managers – in coordination with the affected person.
 - When needed (complex cases, conflicts of interest) or upon request of the affected person, the external advisor becomes involved.
 - Affected individuals may choose to be represented by another person.
 - Decisions on measures are taken by the employer/board in accordance with the statutes, anti-discrimination guidelines, the Code of Conduct, and applicable EU and national legislation.
 - In cases involving the board, the external advisor participates in the decision.
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Complaint Process

0) Information

The complainant is informed about:

- The option to speak to a contact person before officially filing a complaint.
- The steps of the complaint procedure.
- Options for independent and confidential counselling.
- A support tool (complaint form).

1) Submission

The complainant chooses a reporting channel (in-person, written, anonymous).

2) Initial Conversation

- Clarification of the situation.
- Discussion of immediate and protective measures and possible next steps.

3) Implementation of immediate and protective measures.

4) Review

- Thorough examination of the incident by the contact persons.
- Consultation with the external advisor if needed.

5) Decision on Measures

- Structural or educational measures such as workshops or mediation.
- Sanctions such as warnings or termination of contractual relationships.

6) Closure

Feedback meeting with the complainant and, if relevant, the affected person.

7) Evaluation

Regular review and improvement of procedures and measures.

Possible Measures

Preventive Measures

- Regular training on diversity, discrimination awareness and conflict resolution.
- A binding Code of Conduct for all members, collaborators and international partners.

Structural Measures

- Moderated feedback meetings or mediation.
- Ensuring balanced power relations and monitoring dependencies.“

Sanctions

- Warning in cases of discriminatory behaviour.
 - Termination of contracts.
 - Exclusion from the organisation in cases of severe misconduct.
 - All measures comply with relevant legal frameworks on EU and national level.
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Documentation and Confidentiality

- All complaints and measures are documented in a confidential registry by the contact persons.
- Access is limited to the designated contact persons and, if involved, the external advisor.
- Personal data is only shared with the consent of the affected individual, in accordance with GDPR.