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Version: EN

## EEB3 | Staff Psychosocial Risks at Work Policy

(Aligned with European School Memorandum Ref: 2021-08-M-2-en-1 "Recommended courses of action for dealing with the phenomenon of harassment of staff in the European Schools")

### 1. Purpose and Commitment

EEB3 is committed to maintaining a safe, respectful, and inclusive working environment. Harassment in any form is strictly prohibited and will not be tolerated. This policy outlines prevention, reporting, and resolution processes related to workplace harassment in line with the guidelines provided by the European Schools.

### 2. Definitions

In accordance with Belgian law, psychosocial risks at work are defined as the likelihood that one or more workers will suffer psychological harm, which may also be accompanied by physical harm, because of exposure to aspects of work organization, work content, working conditions, working environment, and interpersonal relationships at work over which the employer has an influence and which objectively pose a danger.

#### Different forms of psychosocial risks include:

- **Workplace Violence:**  
Any situation in which a worker or another person to whom this section applies is threatened or assaulted, either psychologically or physically, while performing their work.
- **Sexual Harassment:**  
Any unwelcome verbal, non-verbal, or physical behaviour of a sexual nature that has the purpose or effect of undermining a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment.
- **Cyberstalking** (e.g. use of emails as passive-aggressive tools to complain about the teaching method of teachers, circulation of sensitive/false information via email discrediting certain teachers).
- **Moral Harassment:**  
A series of abusive acts—whether similar or different, internal or external to the school—that occur over a period of time, with the aim or effect of undermining the personality, dignity, or physical or psychological integrity of a worker or another person to whom this section applies, during the performance of their work; endangering their employment; or creating an intimidating, hostile, degrading, humiliating, or offensive environment. These behaviours may include words, intimidation, actions, gestures, or unilateral writings. They may be related to age, marital status, birth, wealth, religious or philosophical beliefs, political or trade union convictions, language, current or future health status, disability, physical or genetic characteristics, social origin, nationality, presumed race, skin colour, ancestry, national or ethnic origin, sex, sexual orientation, gender identity, or gender expression.

### 3. Application

This policy applies to:

- All EEB3 staff (teaching and non-teaching personnel regardless of their employment status)
- Interns and trainees working at EEB3.

### 4. Policy Principles

- **Proactive prevention:** School is committed to identifying and reducing psychosocial risk factors in advance by promoting a healthy, respectful, and inclusive work environment.
- **Zero Tolerance:** Harassment will not be tolerated under any circumstances.
- **Confidentiality:** All complaints will be treated sensitively and confidentially.
- **Impartiality:** Investigations will be fair and objective.
- **Support:** Victims will be supported throughout the process.

### 5. Code of Conduct

At EEB3, we have a healthy working environment, and we look after this by having a zero tolerance to any form of harassment. It is our aim to have a respectful, inclusive, and safe environment, where colleagues are treated with respect, dignity, and professionalism.

We pride ourselves on our courteous and constructive communication, fostering a supportive and collaborative workplace culture. Our employment contracts will include a statement whereby all employees need to adhere to the policies and procedures published or communicated by the school, including this policy document.

#### Preventive Measures

- ▶ Training: Sessions on harassment awareness and respectful communication.
- ▶ Communication: Welcome pack to new staff will include the EEB 3 Staff Psychosocial Risks at Work Policy
- ▶ Policy will also be placed on the school website. The policy will also be circulated to the school community.
- ▶ Wellbeing Coordinators: EEB 3 has 2 well-being coordinators (one in each cycle) who organise several initiatives each year that contribute to team building and promote a sense of well-being amongst staff.

#### Key persons in dealing with Psychosocial Risks at Work within EEB3

**EEB3 Person of Trust** is a trained staff member available for confidential advice.

- ▶ The Person of Trust provides confidential support to staff facing harassment, backed by mandatory training. They act independently, coordinate with the Internal Prevention Service, and are bound by legal confidentiality.
- ▶ The Person of Trust is responsible for providing a safe and confidential space for individuals to report harassment. They listen attentively, offer support, and guide victims through the appropriate procedures while ensuring their privacy and dignity are respected. Additionally, they help raise awareness about harassment policies and promote a respectful and inclusive environment.

**The Internal Prevention Advisor (IPA)** is responsible for supporting the school management in implementing this policy on workplace well-being.

Their main responsibilities are as follows:

- ▶ Inform, advise, and support staff members facing situations of distress or harassment at work.
- ▶ Participate in the development, implementation, and monitoring of the school's prevention policy.
- ▶ Collaborate with the Person of Trust and the External Prevention Advisor in handling reported situations.
- ▶ Ensure the confidentiality of all actions and compliance with the legal framework.
- ▶ Facilitate, when necessary, the initiation of a formal psychosocial intervention procedure

**The External Prevention Advisor (Cohezio)** is an independent expert affiliated with the External Service for Prevention and Protection at Work. Their role is to intervene in complex, sensitive, or conflictual situations, in support of the Internal Prevention Advisor and the Person of Trust.

Their responsibilities include:

- ▶ Providing psychological and legal support in cases of harassment or workplace violence.
- ▶ Conducting or supervising mediations or formal psychosocial interventions at the request of the employee.
- ▶ Ensuring the confidentiality of discussions and compliance with legal procedures (notably the Law of August 4, 1996, and its implementing decrees).
- ▶ Advising the employer on the prevention of psychosocial risks, including collective aspects such as work climate and corporate culture.

## 6. Roles & Responsibilities

Role	Responsibilities
<b>EEB3 Management</b> Director, Deputy Director Nursery and Primary, Deputy Director, Secondary, Deputy Director, Finance and Administration, Assistant Deputy Director, Nursery and Primary and Assistant Deputy Director Secondary.	Ensure safe work environment, respond to complaints, implement measures.
<b>Internal Prevention Advisor</b> M. Felipe Espana Fox <a href="mailto:ixl-safety-security-officer@eursc.eu">ixl-safety-security-officer@eursc.eu</a>	Guide staff, handle procedures, liaise with external advisers. The IPA supports management in implementing preventive policies and promotes safe, respectful working conditions. They advise staff on procedures and rights related to harassment and collaborate with the Person of Trust on internal cases.
<b>External Prevention Advisor (EPA) (CESI)</b> <a href="mailto:psychosocial@cesi.be">psychosocial@cesi.be</a> <a href="http://www.cesi.be/contact">www.cesi.be/contact</a> Tél. 02/761.17.74 (from 08:00 to 17:00 on answering machine: leave a message with name, telephone number and company name)	Intervene in complex, sensitive, or conflictual situations, in support of the Internal Prevention Advisor and the Person of Trust. The EPA is an independent expert who provides legal and psychological support, including, mediation in complex cases. They offer confidential counselling and help the school identify and address systemic issues.

<b>EEB3 Person of Trust</b> Mme Athina Thanou <a href="mailto:ixl-person-of-trust@eursc.eu">ixl-person-of-trust@eursc.eu</a>	Listen confidentially, support victims, help report concerns.
<b>Staff Representatives</b>	All staff representatives are there to support the employees in line with the relevant staff regulations. The main responsibilities are: <ul style="list-style-type: none"> <li>• Representation of staff interests</li> <li>• Acts as a liaison between staff and management</li> <li>• Raises collective concerns or grievances to leadership</li> </ul>
<b>Staff</b>	Respect others, report concerns, participate in training and contribute to zero tolerance of any form of psychosocial harm.

## 7. Parents / Legal Representatives Responsibility

EEB3 enjoys a healthy relationship with the parents of the pupils in the school. While conflicts and disagreements can happen, we are to be reminded that employees of the school are to be treated with the utmost respect as is expected of them towards parents/legal representatives.

The professional role of employees must be respected. Any harassment will not be accepted. Such conduct is unacceptable and will result in appropriate action, which may include restricted communication, formal warnings, or involvement of legal authorities.

All members of the school community are expected to engage in respectful and constructive dialogue to support a positive and safe learning environment.

## 8. Reporting Procedures

A member of staff who experiences or witnesses psychosocial harm can report the case to one of the following:

- ⇒ A member of the management team.
- ⇒ The staff representative
- ⇒ The Person of Trust
- ⇒ The Internal Prevention Advisor
- ⇒ The External Prevention Advisor

As part of this procedure, the employer shall, to the extent that they can influence the risk, take appropriate preventive measures to eliminate the harm by applying the general principles of prevention as defined by law.

There are two procedures that can be implemented and decided upon by the concerned employee: the informal psychosocial intervention and the formal psychosocial intervention.

### **8.1.1. Informal Psychosocial Intervention**

If an employee has justified reason to believe that they have suffered psychosocial harm, they can seek an informal resolution with the Person of Trust or the External Prevention Advisor, through means such as:

- ▶ Interviews including meeting, active listening, and advice,
- ▶ Intervention with another person in the organization, such as a member of the management line,
- ▶ Mediation between the involved parties, with their consent

### **8.1.2. Formal Psychosocial Intervention**

If an employee has justified reason to believe that they have suffered psychosocial harm they can seek a formal resolution with the External Prevention Advisor. Normally, the formal route is taken if the employee does not wish to use the informal intervention or if it has not led to a solution.

This formal request involves asking the employer to take appropriate collective and individual measures based on the analysis of the specific work situation and the recommendations made by the External Prevention Advisor in their report.

A mandatory personal interview with the External Prevention Advisor must take place before the request is submitted.

The procedure that follows depends on the nature of the risks identified and may be one of the following:

- I. Formal psychosocial intervention request of a primarily collective nature
- II. Formal psychosocial intervention request of a primarily individual nature
- III. Formal psychosocial intervention request for acts of violence or moral or sexual harassment

Employees can consult the Person of Trust and the External Prevention Advisors whenever they wish. It is to be noted that these individuals are bound by professional secrecy, and all discussions are strictly confidential.

An external company worker who believes they are a victim of violence or moral or sexual harassment by an employee of the host organization where they perform regular duties may use the internal procedure of that host employer.

## **8.2. Register of External Acts of Violence, Moral or Sexual Harassment at Work**

Employers whose workers interact with third parties at the workplace must consider this specific risk in their risk analysis and preventive measures. To this end, the employer considers, among other things, statements made by workers, which are recorded in a third-party incident register.

This register is maintained by the Person of Trust or the External Prevention Advisor.

These statements include a description of the acts of violence or harassment experienced by the worker, along with the date of the incident. The worker's identity is not recorded unless they consent to its disclosure.

Only the employer (the Director), the External Prevention Advisor, the Person of Trust, and the Internal Prevention Advisor have access to this register.



## 9. Follow-up and Support

- Regular check-ins with affected staff.
- Psychological support via external partners (e.g., Cohezio).
- Monitoring of team dynamics.

## 10. Confidentiality and Protection

- All reports are confidential.
- No retaliation allowed.
- Persons of Trust and advisors are protected from interference.

## 11. Monitoring and Review

- Policy reviewed every 2 years.
- Staff feedback collected.
- Compliance with Belgian law and European School regulations ensured.

## Conclusion

As a school community, we have built a serene and respectful environment with the great effort from all employees at EEB3. It is important that in a multicultural environment we continue to maintain this harmony for the well-being of all employees.