

Anti-discrimination and harassment in the workplace policy

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Applicable to all employees of Berghof Foundation, associates and external collaborators as well as partner organisations – as outlined in section 4, below

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1. POLICY STATEMENT

The Berghof Foundation is committed to providing a safe, fair, and respectful workplace where all individuals are empowered to contribute fully and thrive professionally. We do not tolerate harassment, sexual harassment, or discrimination, whether intentional or unintentional.

Discrimination based on race, ethnicity, gender, sexual orientation, religion, age, disability, political belief, family status, or any other legally protected ground is strictly prohibited. This includes psychological and personal harassment, as well as any conduct that undermines dignity, creates a hostile working environment, or disproportionately affects equity-seeking groups.

It is important to recognise that harassment and bullying are not to be confused with differences of opinion, temporary interpersonal conflicts, or lack of cooperation – situations that can naturally occur in any workplace.

This policy ensures that all concerns are taken seriously and addressed through clear procedures that protect privacy and prohibit retaliation. The Berghof Foundation aims not only to meet legal standards, but to exceed them by fostering a culture of inclusion, accountability, and continuous learning through regular training, dialogue, and transparent processes.

2. PURPOSE

The purpose of this policy is to reinforce key messages and expectations related to ensuring a safe working environment for all staff, with a particular emphasis on harassment and discrimination. It aims to:

- Outline what constitutes prohibited behaviour in the workplace
- Clarify responsibilities and procedures in addressing workplace harassment and discrimination
- Encourage the reporting of incidents and remove barriers to doing so.

3. KEY DEFINITIONS

Berghof Foundation has an overarching anti-harassment approach covering both harassment and bullying.

Violence and harassment – violence and harassment in the workplace refers to a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.¹

¹ Under § 3 Abs. 3 AGG, harassment is recognised as a form of prohibited disadvantage (“Benachteiligung”) based on a protected characteristic (e.g., race, gender, religion, disability, sexual identity, age) and includes: unwanted behaviour linked to a protected trait that aims to – or actually does violate the affected person’s dignity; creation of an environment characterised by: intimidation (Einschüchterung), hostility or animosity (Anfeindung), humiliation or degradation (Erniedrigung / Entwürdigung), insults or slurs (Beleidigung).

Such conduct is considered unacceptable when, based on both subjective experience and objective assessment, it causes or is likely to cause physical, psychological, sexual, or economic harm.²

Harassment can be inflicted by an individual (**bullying**) or by a group (**mobbing**).

Examples of workplace violence and harassment:

- Abusing a person loudly, including when others are present.
- Repeated threats of dismissal or other severe punishment that do not follow the Berghof Foundation Discipline Guideline and Internal Response Process.
- Making/sending offensive messages (e.g. via email, telephone or other forms of communication).
- Significantly impairing a person's work in any way; this includes but is not limited to withholding information essential for the fulfilment of a person's job, removing content from a person's work or altering its meaning.
- Maliciously excluding and isolating a person from workplace activities that they would normally be involved in.
- Persistent and unjustified criticism, often about petty, irrelevant or insignificant matters.
- Humiliating a person through gestures, sarcasm, criticism and insults, often in front of others.
- Spreading false information.
- Not respecting the division between private and professional life.

Sexual Harassment (SH) is specifically addressed in the Berghof [Policy on Protection from Sexual Exploitation, Abuse and Harassment \(PSEAH\)](#). However, it is also referenced in this policy to ensure consistency and reinforce the Berghof Foundation's commitment to maintaining a workplace free from all forms of harassment, including sexual harassment.

Sexual Harassment (SH) – a range of unacceptable and unwelcome behaviours and practices between colleagues of a sexual nature that may include, but are not limited to, sexual suggestions or demands, requests for “sexual favours”, sexual, verbal or physical conduct, or gestures that are or might reasonably be perceived as offensive or humiliating. This includes jokes, comments or messages of a sexual nature; suggestive looks, staring or leering; the display or circulation of pornographic material.

While sexual harassment typically involves a pattern of conduct, it may also take the form of a single incident. The perspective of the person who is the target of the conduct shall be considered when assessing the reasonableness of expectations or perceptions.

Our definition intentionally excludes intent as a required element. This reflects a pragmatic, survivor-centred approach that prioritises addressing the unacceptability of the behaviour, actions, or threats, and focuses on their impact on survivors rather than the perpetrator's intent³.

² International Labour Organisation (ILO) Convention 190, in force in Germany since 14.07.2023

³ This is in line with the German General Act on Equal Treatment (AGG) that defines sexual harassment in terms of the objective perception of what happened and not in terms of the intention of the harassing person. Thus, the key aspect is only whether certain conduct is objectively of a sexual nature and the person concerned felt harassed by it.

The Berghof Foundation recognises that harassment is often closely linked to unequal **power relationships** in the workplace, for example by a manager towards a subordinate (vertical relationships). However, power is not always equated to authority. It can also include physical strength or the power to coerce through fear or intimidation. It is therefore possible for harassment to occur the other way around (by subordinate towards a manager), or in peer (horizontal) relationships.

Bullying – is repeated, persistent behaviour directed at one or more workers that humiliates, intimidates, or undermines their dignity or safety. It may be psychological, verbal, physical, or social, and it creates a hostile work environment that negatively affects the victim's well-being and job performance.⁴

The relationship involves an abuse or misuse of power and can be offensive, intimidating, malicious or insulting, leaving the survivor feeling demeaned and inadequate. For example, shouting or swearing at people in public and private, persistent unconstructive and/or unjustified criticism, ignoring or deliberately excluding people from professional activities for personal reasons, persecution through threats and instilling fear, and spreading malicious rumours. Bullying is not a one-off occurrence but is carried out over for a longer period of time.

Mobbing – is bullying of an individual by a group of co-workers.

Discrimination – Discrimination is any unfair treatment or arbitrary distinction based on a person's race, sex, gender, sexual orientation, gender identity, gender expression, religion, nationality, ethnic origin, disability, age, language, social origin or other similar shared characteristic or trait. Discrimination may be an isolated event affecting one person or a group of persons similarly situated or may manifest itself through harassment or abuse of authority.⁵

(1) Direct discrimination is taken to occur where one person is treated less favourably than another has or would have been treated in a comparable situation on any of the grounds referred to in section 1 of the General Act on Equal Treatment. Direct discrimination on the ground of gender is also taken to occur in relation to section 2 (1) nos. 1 to 4 of the General Act on Equal Treatment in the event of the less favourable treatment of a woman on account of pregnancy or maternity.⁶

(2) Indirect discrimination is taken to occur where an apparently neutral provision, criterion or practice is liable to put persons at a particular disadvantage compared with other persons on any of the grounds referred to in section 1, unless that provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are appropriate and necessary.⁷

Example of protected personal characteristics include:

- A disability, disease or injury, including a work-related injury,
- Parental status or status as a carer, for example, because they are responsible for caring for children or other family members,

⁴ International Labour Organisation (ILO), Workplace Violence and Harassment Convention, 2019 (No. 190), Article 1

⁵ Secretary-General's bulletin Addressing discrimination, harassment, including sexual harassment, and abuse of authority, 2019.

⁶ General Act on Equal Treatment, (Allgemeines Gleichbehandlungsgesetz – AGG), Germany December 2023.

⁷ General Act on Equal Treatment, (Allgemeines Gleichbehandlungsgesetz – AGG), Germany December 2023.

- Race, colour, descent, national origin, or ethnic background,
- Age, whether young or old, or because of age in general,
- Religion,
- Pregnancy and breastfeeding,
- Sex,
- Sexual orientation, intersex status or gender identity, including gay, lesbian, bisexual, transsexual, transgender, queer and heterosexual,
- Marital status, whether married, divorced, unmarried or in a de facto relationship or same sex relationship,
- Political opinion,
- Industrial activity, including being a member of an industrial organisation like a trade union or taking part in industrial activity, or deciding not to join a union,
- Social origin,
- Medical record,
- An association with someone who has, or is assumed to have, one of these characteristics, such as being the parent of a child with a disability.

All **recruitment and job selection** decisions at the Berghof Foundation will be based strictly on merit – that is, the candidate’s skills, experience, and abilities as measured against the inherent requirements of the position – regardless of personal characteristics.

It is unacceptable, and may be contrary to applicable anti-discrimination laws, to ask job candidates questions about personal characteristics (such as outlined above), unless this information is clearly and directly relevant to a genuine occupational requirement.

Any discriminatory behaviour or bias in recruitment, whether explicit or implicit, undermines fairness and may be addressed under this policy.

Gossip - While casual conversations aren’t inherently harmful, malicious or persistent gossip can contribute to a hostile work environment, harm reputations, undermine trust, and even amount to psychological harassment or bullying, especially when targeted.

It is unacceptable for employees at the Berghof Foundation to discuss any complaint of discrimination or harassment with other employees, clients, or suppliers, outside of the formal reporting or investigation process.

Breaching the confidentiality of a formal complaint investigation or inappropriately disclosing personal information obtained through a professional role (e.g. as a manager or supervisor), constitutes a serious violation of this policy and may result in formal disciplinary action, up to and including termination.

4. SCOPE

The Anti-Discrimination and Harassment in the Workplace Policy (“the Policy”) applies to:

a) **All employees of the Berghof Foundation**

This includes full-time employees, temporary personnel, and interns, regardless of their contractual status, responsibilities, or location of employment. All Berghof staff are required to adhere to the principles and reporting requirements outlined in this policy.

No individual is exempt from this Policy. Violations will be addressed in accordance with relevant employment policies and procedures and may result in disciplinary actions, including termination of employment and potential legal prosecution. Safeguarding background checks may also be conducted with current and previous employers at any stage of the recruitment process.

b) Associates and external collaborators

This includes:

- Consultants and advisors,
- Contractors and their personnel,
- Suppliers in direct contact with Berghof's target population,
- Sub-contractors,
- Sponsorship partners,
- Volunteers involved in Berghof Foundation projects,
- Visitors to Berghof Foundation programme areas,
- Staff seconded to and from Berghof Foundation.

These groups are expected to apply the policy commensurate with the level of harassment and discrimination risk associated with their activities and their organisation.

c) Partner organisations

This includes organisations receiving material or non-material support from Berghof Foundation. Partner organisations are required to act in accordance with the principles and reporting requirements outlined in this policy and adhere to their own relevant policies, international declarations, conventions, agreements, and domestic legal frameworks concerning anti-discrimination and harassment. Berghof Foundation will incorporate anti-discrimination and harassment into its due diligence processes and requires assurances of policy application from partner organisations.

Where required by law or local practices, Berghof Foundation country offices may enhance the standards set out in this policy. Compliance with this policy will be evidenced through signing Berghof Foundation's Code of Conduct, and training on this policy is mandatory for all Berghof Foundation staff, associates, and partners.

5. EMPLOYEE RIGHTS AND RESPONSIBILITIES

All employees are entitled to:

- Recruitment, selection, decisions based on knowledge, competence, experience and merit and not affected by irrelevant personal characteristics.
- Work free from incivility, discrimination, bullying and sexual harassment.
- The right to raise issues or to make an enquiry or complaint in a reasonable and respectful manner without being victimised.
- Reasonable flexibility in working arrangements, especially where needed to accommodate their family responsibilities, disability, religious beliefs or culture.

All employees must:

- Follow the standards of behaviour outlined in this policy.
- Offer support to people who experience discrimination, bullying or sexual harassment, including providing information about how to make a complaint.
- Avoid gossip and respect the confidentiality of complaint resolution procedures.
- Treat everyone with dignity, courtesy and respect.
- Report misbehaviour witnessed through appropriate channels.

Responsibilities of leaders and managers

All managers, supervisors and directors are responsible for helping to create and maintain a working environment free from harassment and discrimination. Managers may be held legally liable for failing to act.

The responsibilities reflect and align with our leadership standards.⁸

The responsibilities of Berghof Foundation management and leadership include:

- Policy dissemination: Ensuring that all staff and individuals working on behalf of the organisation are informed about the content and principles of this policy. Ensure all members of the manager's team treat the policy seriously by setting a personal example for others.
- Policy enforcement: Taking prompt and appropriate action when any breach of this policy occurs, ensuring accountability and adherence to its standards.
- Act fairly to resolve issues and enforce workplace behavioural standards, making sure relevant parties are heard.
- Refer formal complaints about breaches of this policy to the appropriate complaints handling unit for investigation (as set out in section 9)
- Ensure employees who raise an issue or make a complaint are not victimised.
- Ensure that all actions of employment (recruitment, selection, pay and benefits etc.) decisions are based on merit and that no discriminatory requests for information are made.
- Ensuring that a plan of action for the implementation of the policy is established, including necessary resources.

6. OUR PRINCIPLES

Zero-tolerance

The Berghof Foundation has a zero-tolerance approach to sexual, verbal or physical harassment, bullying or any kind of discrimination including that based on gender, race, ethnicity, age, sexual orientation, gender identity, disability, faith, or any other aspect of our beings.

⁸ See Berghof Code of Conduct, 3. Leadership Standards

Strong leadership accelerates culture change

Leaders set the tone for organisational culture. Berghof Foundation expects leaders to set clear expectations and model respectful behaviour in their interactions at work. This will support staff members to feel safe, report concerns and be assured their allegations are taken seriously.

Strong leaders address workplace harassment and discrimination by taking measures to improve diversity and inclusion. Leaders will encourage scrutiny of their own behaviour and that of senior management.

People-centred approach

Berghof Foundation strongly believes that addressing workplace harassment and discrimination must be guided by the “do no harm” principle, prioritising the rights, needs, and wishes of the person affected while maintaining procedural fairness for all parties. This approach emphasises:

- **Dignity and respect:** Treating the person affected with the utmost dignity and respect.
- **Active involvement:** Engaging the person affected in decision-making processes that affect them.
- **Informed support:** Providing comprehensive information to enable the person affected to make informed choices.
- **Confidentiality:** Ensuring privacy and confidentiality to protect the identity and wellbeing of those involved.
- **Non-discrimination:** Guaranteeing equitable treatment regardless of gender, age, race/ethnicity, disability, sexual orientation, or other characteristics.
- **Access to services:** Offering compassionate, professional support services such as counselling and healthcare to aid recovery, where possible.

Our support will be extended to the person affected irrespective of the participation in or the outcome of investigations.

Addressing gender inequality and power imbalances

The intersection of gender with other forms of inequality can further amplify the risk of workplace harassment and discrimination. Berghof Foundation applies an intersectional approach to anti-workplace harassment and anti-discrimination. Berghof Foundation further recognises that harassment and discrimination disproportionately (though not exclusively) affect equity-seeking groups and actively strives to become a learning organisation in this domain through an ongoing commitment to dialogue, feedback, evaluation and training.

All allegations will be taken seriously and treated confidentially

All information and reports of concern regarding workplace harassment and discrimination will be taken seriously. Berghof Foundation maintains confidentiality and does not disclose any personal details of those involved.

Respecting local culture without compromising principles

Addressing workplace harassment and discrimination requires nuanced, locally tailored solutions that consider social norms, dynamics, and local policy and legal frameworks. Violence at work is perceived differently across cultures, and effective prevention and response strategies must be adapted to the specific context of each community. Berghof Foundation (via the support of Heads of Units) is committed to supporting locally informed and inclusive analyses as well as context-specific, inclusive interventions, to ensure the success of anti-discrimination and harassment efforts.

However, cultural considerations can never justify or excuse behaviour that is abusive or harassing. Adherence to universal principles of dignity, respect, and human rights remains non-negotiable for Berghof Foundation.

7. OUR PREVENTIVE ACTIONS

Berghof Foundation is dedicated to ensuring that all staff and individuals associated with our organisation fully understand the definitions of violence at work, their responsibilities in preventing such harm, and the appropriate actions to take if incidents occur. We strive to make our staff, partners, and the communities we work with aware of this policy, clearly communicate the standards of behaviour they can expect, and provide accessible channels for reporting any concerns.

Transparent recruitment and human resource management

Berghof Foundation is committed to preventing discriminatory and harmful forms of behaviour from the outset of the recruitment process. We ensure hiring, promotion, and pay processes are transparent and bias-resistant. This commitment is reflected in:

- Job advertisements: We use inclusive language in job ads and internal communications and include a statement of inclusivity in our job advertisements.
- Interview processes: During job interviews and recruitment processes, interviewers and hiring managers at the Berghof Foundation must not ask questions or seek information related to protected personal characteristics, unless directly relevant to a legitimate occupational requirement.

Awareness, capacity development and training

- Mandatory onboarding for all staff on harassment, discrimination, and respectful workplace behaviour within the onboarding training.
- Regular manager-specific exchanges to identify early warning signs and respond appropriately.
- Regular refreshers or updates on evolving standards, including implicit bias and inclusive communication.

Respect for dignity in media and communications

Berghof Foundation ensures that all media and communications related to its work adhere to zero tolerance of discrimination and workplace harassment. This commitment extends to:

- Visual language and photography: Ensuring respectful and dignified representation in all imagery used.
- Print and digital publications: Applying these standards to materials such as flyers, brochures, and other printed content.
- Online platforms and social media: Maintaining a zero-tolerance principle in all posts, publications, and shared content across websites and social media channels.

Through these measures, Berghof Foundation upholds the dignity and rights of individuals featured or represented in its communications.

Partner assessments and due diligence

During capacity development and due diligence processes, the anti-discrimination and harassment in the workplace policy will be included as part of the broader safeguarding approach.

8. OUR REPORTING PRINCIPLES & PROCEDURES

The Berghof Foundation is committed to fostering a workplace culture rooted in dignity, respect, and inclusion, and actively works to prevent and address relational violence, harassment, and discrimination. This includes looking into concerns or suspicions raised via rumours or gossip.

With the aim of supporting employee wellbeing and making the reporting process as accessible and non-intimidating as possible, Berghof Foundation provides multiple lines of support to any employee affected by harm.

Berghof Foundation will ensure the **availability of safe and accessible reporting channels**, providing multiple pathways for individuals to report workplace harassment and discrimination concerns (see section 9).

The Berghof Foundation recognises that **power dynamics and/or a history of harm** may discourage employees from reporting harassment or from directly confronting the individual responsible. A reluctance to address the situation face-to-face will not affect an employee's right to due process or access to support.

Employees are encouraged to use the confidential reporting channels provided by the organisation if that feels safer or more appropriate (see section 9). All reports will be handled with sensitivity, impartiality, and respect for privacy.

As long as the person raising a concern does so in **good faith**, they only need to **genuinely** believe that there is an issue before making a disclosure. If after an investigation the disclosure is found to be unsubstantiated, the person who raised the concern will still be protected under the German Whistleblower Protection Act 2023⁹.

⁹ Hinweisgeberschutzgesetz or the German Whistleblower Protection Act came into force at the beginning of July 2023.

If the person making the disclosure does so in **bad faith**, for malicious or vexatious reasons, then they will not be protected under the German Whistleblower Protection Act 2023, and their complaint may result in disciplinary action.

In-line with the principle that **victims' and survivors' needs are prioritised**, their safety and well-being must be the foremost consideration during the reporting process, and their information must be kept confidential. Whistleblowers must also feel safe and protected throughout the reporting process.

The following principles are therefore fundamental for Berghof Foundation:

Confidentiality of complaints

Berghof Foundation is committed to safeguarding the confidentiality of allegations of workplace harassment and discrimination to the greatest extent possible. This approach aims to protect the integrity of investigations and prevent harm, including stigmatisation, further discrimination and harassment, or retaliation.

Confidential or sensitive information obtained by staff during an investigation will not be disclosed unless legally required. Any concerns regarding the confidentiality of information provided will be addressed with utmost sensitivity. However, complete confidentiality cannot be guaranteed, as conducting a thorough investigation may necessitate sharing certain details with the subject of the allegations or potential witnesses.

Berghof Foundation will limit the sharing of information about allegations strictly to those who need to know. Additionally, all records will be handled and stored confidentially, adhering to the same principles of restricted access.

Whistleblower protection

In line with the German Whistleblower Protection Act 2023 all disclosures are treated with strict confidentiality. Berghof Foundation provides a secure, third-party reporting system to enable staff, partners, and vendors to report potential misconduct safely and anonymously.

While anonymous reporting is allowed, it is not encouraged, as anonymity may limit the protections afforded under this policy and can complicate the investigation process. Anonymous reports will only proceed to preliminary review and investigation if objective facts substantiate the claims. Therefore, it is essential that anonymous reports include sufficient supporting evidence to enable further investigation.

Zero tolerance for retaliation

Berghof Foundation maintains a zero-tolerance policy for retaliation against individuals who report sexual, verbal, or physical harassment, bullying and any kind of discrimination, assist in filing a complaint, or participate in an investigation. Any staff member, associate, or partner who, in good faith, reports such misconduct, assists in the process, testifies, participates in investigations, or reasonably opposes such behaviour in the workplace is protected. Their terms and conditions of employment will not be adversely affected, and they will not face discrimination or dismissal for engaging in these activities.

Retaliation and intimidation harm not only the individuals involved but also undermine trust in Berghof Foundation's leadership, damaging employee morale and organisational integrity.

Complaints of retaliation will be investigated promptly. If retaliation is confirmed, Berghof Foundation will take appropriate disciplinary action, up to and including termination of

employment. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

People-centred approach

Berghof Foundation applies the principles of a people-centred approach, prioritising the rights, safety, needs, well-being, and dignity of the person affected during reporting, case management and/or investigations. The person affected who reports an incident is supported in accessing necessary services, regardless of their decision to participate in an investigation.

Berghof Foundation prioritises the empowerment of people affected by presenting them with available options while refraining from imposing opinions or directing them toward any particular course of action.

9. HOW TO REPORT?

Berghof Foundation understands that the person affected often does not report incidents through established reporting mechanisms.

Therefore, reports may be received through various channels including:

- Written reports submitted through Berghof Foundation's secure online (anonymous) [whistleblowing tool](#),
- Designated email: complaints@berghof-foundation.org,
- Human Resources department: hr-support@berghof-foundation.org,
- Workers Council (WoCo): workers.council@berghof-foundation.org,
- Via community-based/local complaints mechanisms,
- Disclosures made directly to staff members,
- Concerns or reports about others raised to staff members.

Report assessment & consent to participate

Assessment is the process by which Berghof Foundation develops a plan for addressing a report of harassment or discrimination. The goal of assessment is to answer the following questions:

- a) Do the behaviours described in the report appear to violate this policy? Why or why not?
- b) Does Berghof Foundation have sufficient access to key witnesses and/or evidence to proceed?
- c) Are there any pressing concerns (e.g., safety concerns, plans for upcoming travel) that need to be considered before a Subject of Concern is notified of any next steps?
- d) Is the Complainant interested in informal resolution/pre-adjudicative options (see below)? If so, are there any compelling safety concerns that preclude these options?
- e) What next steps does Berghof Foundation want to offer the Complainant? Did the Complainant indicate specific goals or hopes in making this report?

Due to the sensitive nature of workplace harassment and discrimination concerns, confidentiality must be maintained during all stages of the reporting process, and information shared on a limited 'need to know' basis only. This includes sharing with senior management who might otherwise be appraised of a serious incident.

If the reporting staff member is not satisfied that the organisation is appropriately addressing the report, they have a right to escalate the report, either up the management line, to the Board of Trustees.

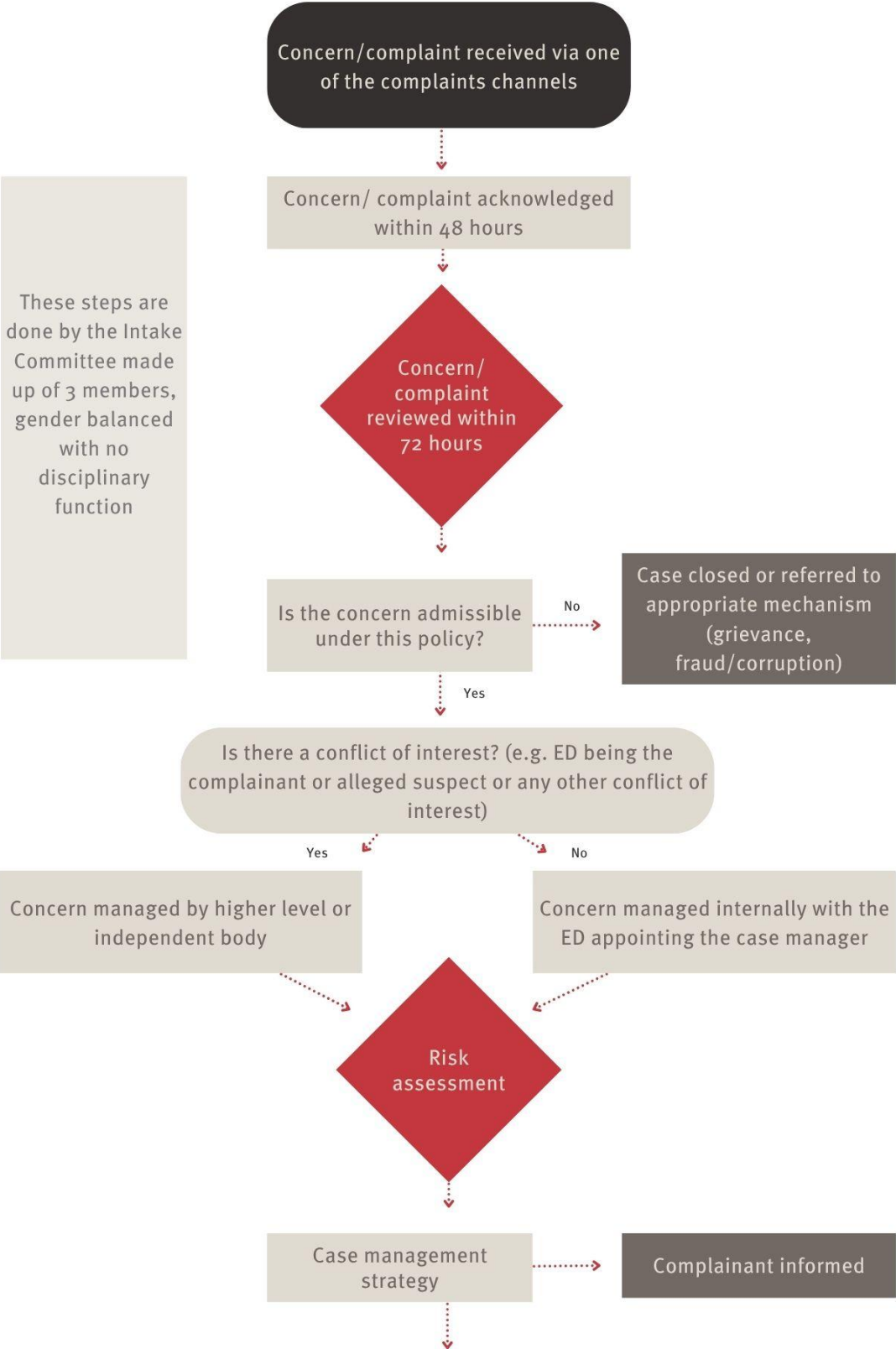
The Intake Committee will communicate the outcome of the initial assessment, in writing, to the Complainant within five (5) working days after receiving the initial report. Should Berghof Foundation move forward with an investigation, the Complainant will be notified of this and will be asked to give their written consent to participate in the investigation.

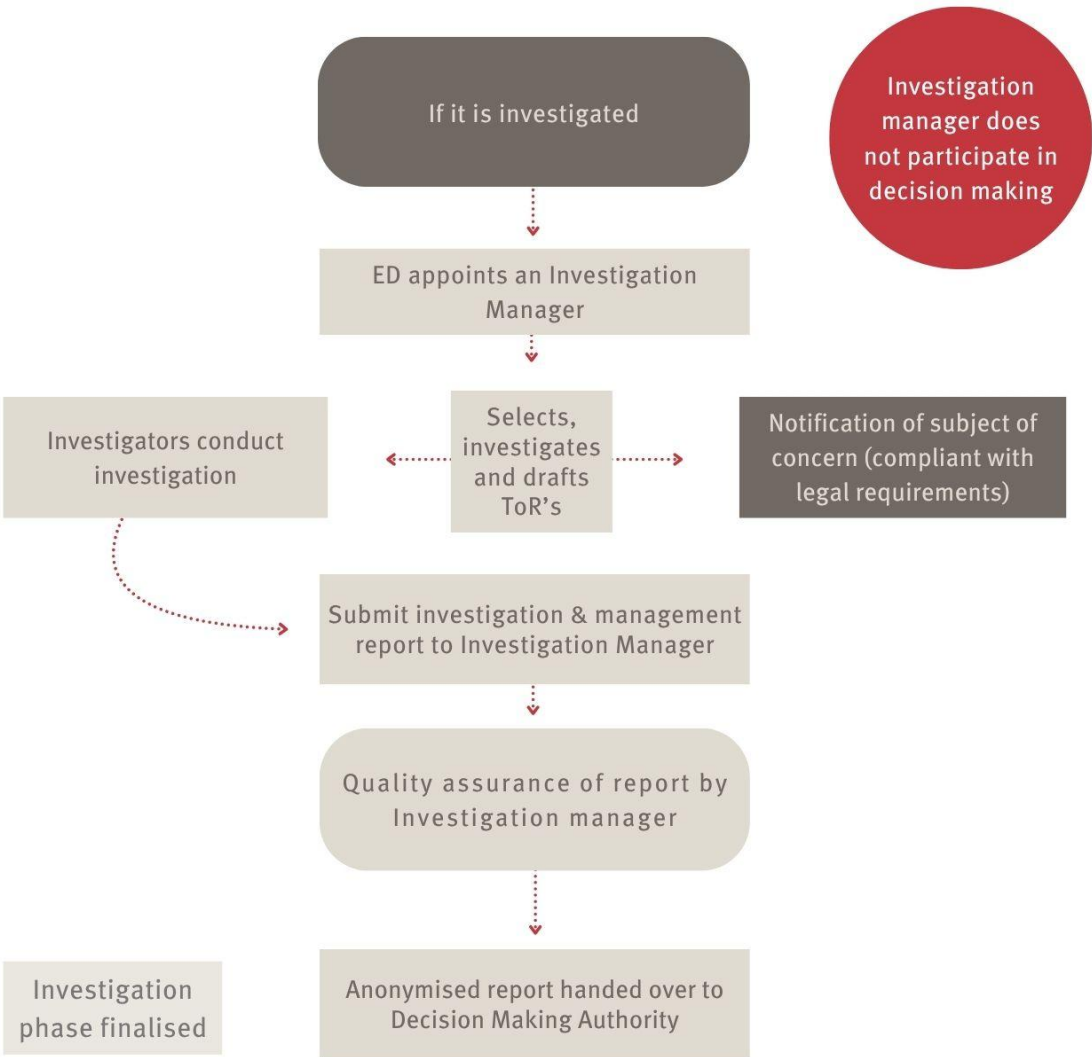
The Complainant has the right, at this or any point, to withdraw their consent to participate in this process. Their choice not to participate may weaken an investigation, but there may nevertheless be sufficient evidence for an investigation to occur, depending on the nature of the incidents.

Non-adjudicative options/informal resolution

Complainants have the right to request informal resolution when they report. Informal resolution is separate from an investigation. It is not concerned with a finding of fact but rather is a mediation between the Complainant and the Subject of Concern in order to develop principles for future contact. Should informal resolution fail, an investigation remains an option. For informal resolution to occur, all parties must consent. No one can be compelled to enter into informal resolution. Informal resolution can be facilitated internally by HR, Workers Council, or by an external mediator.

Complaint procedure





POST INVESTIGATION PHASE



10. ADMINISTRATIVE / CASE MANAGEMENT

When a workplace harassment and discrimination incident is confirmed, the Intake Committee will determine whether it should be investigated internally or by an external investigator, based on the severity and scale of the incident. Any investigation involving sexual exploitation or abuse, children, or senior management at Berghof Foundation, including Board of Trustee members, must include an expert external investigator.

Based on the triage, an appropriate case management approach will be defined by the Intake Committee. The same processes as the PSEAH Policy will be adhered to.

In line with the People-Centred Approach, actions will be fair, and due processes are always assured. Actions will be discussed and in collaboration with the Complainant.

For a full description of the People-Centred Approach, the Investigation Manager's role and the case management procedure, please refer to the PSEAH Policy.

11. LEARNING AND REVIEW

After an incident it is essential to undergo learning and improvement processes to avoid similar incidents occurring in the future.

In line with the sector's best practice, Berghof Foundation agrees to review this policy every three years, as a minimum.