

Code of Conduct

Statement of Values

The European Cultural Foundation (ECF) works for an open, inclusive and better Europe. ECF strongly believes in a core set of values that guide and drive us in our daily work, e.g. solidarity, diversity, sustainability, democracy, rule of law, human dignity and ingenuity, equality and freedom. Staff who work for or on behalf of ECF endorse and are loyal to these values and commit to embedding them in all we do and live by them in our interactions with colleagues, partners, grantees and all other stakeholders.

Externally, staff and Supervisory Board members are expected and agree to act with honesty, integrity and openness in all their dealings as representatives of the organisation.

Internally, ECF has policies in place to ensure a working environment free of any kind of intimidation, aggression or violence. ECF wishes to ensure that the working atmosphere is one in which respect between all colleagues is fostered, regardless of gender, race, nationality, sexual orientation, religion, belief, political leaning, disability, age, sex or marital status. This applies to all staff, interns, temporary personnel, freelancers and others who carry out work on behalf of the Foundation.

Additionally, the Foundation considers it its duty to prevent, investigate, and as appropriate disclose and punish any form of violation of integrity or unacceptable behaviour by its staff, both internally and externally.

Measures

As a member of Goede Doelen Nederland (GDN), ECF complies with all the necessary codes and guidelines, including the CBF-code for good governance and the ‘Erkenningsregeling Goede Doelen’. As of 2019 and in line with the updated GDN requirements, ECF has been streamlining existing and introducing new measures to form a comprehensive Integrity Policy. These measures relate to: 1) prevention, 2) grievance procedure and 3) penalty in the following areas that bear high risk of possible violation or misconduct and are not tolerated by the organisation:

- **Power abuse:** corruption, conflict of interest, leaking of confidential information, culpable negligence. *See the [Declaration of Responsibility](#) on our website to learn what we do to ensure good governance and minimize the risk of misconduct.*
- **Financial violations:** fraud, theft, misuse of resources and services, culpable waste. *See the [Declaration of Responsibility](#) on our website to learn what we do to ensure a healthy and transparent financial management. Additionally, the ECF Staff Manual stipulates that the former ECF staff are allowed to apply for grants from the Foundation only after a period of two years after leaving ECF.*

- **Interpersonal violations:** discrimination, intimidation, violence, bullying, unwanted intimacy, sexual intimidation, sexual violence. *ECF uses an external Confidential Advisor to support employees who are confronted with unwanted behaviour in the workplace.*

* (Sexual) intimidation is understood to be unwanted (sexually nuanced) attention paid by one person to another, which can be expressed in words, gestures or other bodily actions, and which may or may not be intentional.

**Aggression and violence are understood to include bullying, physical or psychological harassment, threats or attacks from others.

For handling incidents that are reported, the Foundation has described a **Grievance Procedure** as well as **Whistleblowing Policy**. These are made available for members of staff and freelancers when signing the work agreement. Third parties receive a copy of these upon request by sending an e-mail to our [Integrity Officer](#).

Additionally, the following new measures in relation to any of the abovementioned types of integrity violations have been introduced as of 1 September 2020:

- An internal Integrity Officer has been appointed;
- A Code of Conduct has been drafted, agreed upon by all staff and published online (see above);
- The Integrity Officer and the Management Team, assisted by an external adviser, have begun researching the vulnerability of the processes and functions in the organisation in order to identify and mitigate integrity risks;
- A clear task distribution and internal process flow for managing integrity violation incidents have been mapped, incorporating policy around investigation and penalties
- An email address has been introduced for external complaints in relation to violations of any kind (see below).

Transparency / Communication

Information about how ECF ensures good governance and transparent financial management is provided on a yearly basis in our publicly available Annual Reports.

External Complaints / Grievance Procedure

To report any misconduct by or to file a confidential complaint about a representative of ECF staff, please write to our [Integrity Officer](#).

ECF actively encourages persons experiencing or witnessing integrity violations to report them so that appropriate action can be taken. All complaints will be treated as confidential, and ECF will take all necessary steps to ensure that persons reporting incidents in good faith will not be treated unfairly. The steps taken to investigate a report are detailed in our grievance procedure, and disciplinary measures will always be determined based on professional, external legal advice.