

STAKEHOLDERS SAFETY POLICY

(February 2024)

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I. Introduction

A. General presentation of the association

VoxPublic is a French association, created in 2016, whose aim is to support and accompany citizen initiatives when they seek to influence public policy with the aim of reducing discrimination and corrupt practices, or promoting social and environmental justice, civil liberties and the rule of law.

VoxPublic aims to serve civil society actors wherever they are located in France. VoxPublic acts in the interests of citizens. It is completely independent of state institutions and businesses¹.

B. Operation and modes of action

To achieve its goal, the association works with the most vulnerable groups, including people in precarious situations, people with disabilities, displaced persons, people in detention, people exposed to a degraded environment and any other group suffering suffering injustice².

VoxPublic:

- conducts research, training, facilitation, communication, decision-making support, assistance and networking activities.
- facilitates the exchange of experiences between French, European and international associations.
- supports other associations pursuing similar objectives³. VoxPublic carries out its actions by all legal means in order to achieve its social purpose.

As a supporting and facilitating actor, VoxPublic uses a methodology that aims to act only in support of civil society actors and never to do 'in their place'. Thus, VoxPublic does not appear on the documents and tools produced by these partners in the context of the campaigns it supports. VoxPublic makes it a point of honour to promote the voices of its partners, and in particular those of the people concerned, so that their voices are heard and their expertise recognised in the media and among civil society actors and public decision-makers.

C. The necessity of a protection policy

VoxPublic considers the establishment of a protection policy to be essential in order to respond to the current realities of the various stakeholders in contact with the organisation, listed below:

- **The people concerned:** These are the most vulnerable groups, who already experience injustice, discrimination and oppression in today's society. VoxPublic's

1 VoxPublic Statutes – article 2

2 VoxPublic Statutes – article 2

3 VoxPublic Statutes – article 2

actions must therefore be carefully considered to ensure their protection in an efficient and effective manner.

- Partner organisations and their collaborators⁴: VoxPublic supports associations, collectives and trade unions working on different issues and at different levels. Some of these civil society actors may be directly composed of affected persons or persons who support them. The protection policy therefore applies to all of these organisations.
- VoxPublic employees: VoxPublic makes it a point of honour to protect its team with a view to promoting a healthy working environment and the well-being of its employees, which is essential for the organisation.
- Direct beneficiaries of our actions and tools: VoxPublic develops tools and/or actions that can be directly relayed and used by citizens (e.g. website, social media, etc.). VoxPublic aims to make these tools as accessible as possible. The actions carried out, such as research, guidance and support, must always pay particular attention to accessibility for all.
- VoxPublic's funders: VoxPublic does not receive any public funds. The association receives funding from private foundations and a limited number of individual donors. VoxPublic ensures that its activities are accessible to all.

The absence of a clearly defined and transparent framework for protection can lead to dangerous behaviour. In order to guarantee the protection of the various stakeholders mentioned above, VoxPublic has established a security framework, of protection and proper treatment through a protection policy consisting of concrete measures to ensure compliance.

II. Values and principles of the organisation

A. Values

VoxPublic is an association that aims to set an example by applying the rules it wishes to see implemented in society:

- **Transparency**: VoxPublic considers transparency to be a value that must be promoted, both within society and within the organisation. This is why it makes public its operations (statutes), its actions and its sources of funding.
- **Independence**: in order to carry out its actions in the best possible way, VoxPublic intends to remain an organisation independent from the State and political parties.
- **Digital openness**: VoxPublic considers that digital technology has social and environmental implications and that it is therefore necessary to promote tools and softwares that respect individuals (free software) and access to data.
- **Non-discrimination**: this is one of the core values of VoxPublic's work, which supports all victims of discriminatory policies and/or practices.
- **Inclusivity**: the organisation pays close attention to issues related to diversity,

⁴ C'est-à-dire toute personne participant aux activités de l'association – salarié-e, stagiaire, apprenti-e, consultant-e, bénévole (membre du CA et de l'AG, ou bénévole occasionnel-le).

equity and inclusion.

B. Principles of action

- **Protecting the partnership and working together:** VoxPublic's role is to assist and support its partners in defining and implementing their campaigns. It is essential for the organisation to defend, promote and nurture the partnership, prioritising good relations and mutual listening. However, VoxPublic cannot work with organisations whose purpose or values contravene the values and working principles of VoxPublic.
- **Creating a healthy working environment:** VoxPublic is made up of a small team and must pay particular attention to respecting everyone's working hours, which may lead to refusing or limiting responses to certain requests. Most of the campaigns supported by VoxPublic are implemented in the medium and long term, however, some of them may be carried out urgently, in response to current events. Regardless of the timing and duration of the support provided by VoxPublic, time is set aside within the team to question and listen to feedback from partners and ensure that the working environment remains healthy. Particular attention is also paid to the prevention of gender-based and sexual violence, mutual respect and equality among employees in order to ensure a healthy working environment.
- **Avoid all forms of exclusion:** the association pays particular attention to discrimination and intersectionality⁵.
- **Value the voices and expertise of partners:** for VoxPublic, it is essential that the people concerned have their say. The organisation believes that it should not speak on behalf of its partner organisations and therefore takes a back seat in favour of its partners and the people concerned.

III. Legal requirements

A. Discrimination

Today, Law No. 2008-496 of 27 May 2008, "*containing various provisions adapting to Community law in the field of combating discrimination*", is the main reference text:

"Direct discrimination is a situation in which, on the basis of a person's origin, sex, family situation, pregnancy, physical appearance, particular vulnerability resulting from their economic situation, apparent or known to the perpetrator, surname, place of residence or bank address, state of health, loss of autonomy, disability, genetic characteristics, morals, sexual orientation, gender identity, age, political opinions, trade union activities, ability to express oneself in a language other than French, or their membership or non-membership, real or supposed, in an ethnic group, nation, alleged race or particular religion, a person is treated less favourably than another is, has been or would have been treated in a comparable situation.

⁵ According to KW Crenshaw's definition, it refers to the attention paid to the mutual reinforcement of direct or indirect discrimination, and to the fact that these cannot be combated separately

Indirect discrimination is constituted by a provision, criterion or practice that is apparently neutral but which is likely to result in a particular disadvantage for grounds mentioned in the first paragraph, a particular disadvantage for some persons compared to others, unless that

provision, criterion or practice is objectively justified by a legitimate aim and the means of achieving that aim are necessary and appropriate."

Furthermore, Article L1142-2-1 of the Labour Code and Article 6 bis of Law No. 83-634 of 13 July 1983 condemn sexist behaviour : "No one shall be subjected to sexist behaviour, defined as any behaviour related to a person's sex, with the purpose or effect of violating their dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment." Article L1142-2-1 of the Labour Code.

B. Harassment

Harassment is the repetition of words and behaviour intended to or resulting in a deterioration of living conditions, which has consequences for the physical or mental health of the person being harassed. Harassment is defined and punished under the Penal Code and the Labour Code. According to Article 222-33-2-2 of the Penal Code:

"Harassment is defined as the repetition of words or behaviour intended to or resulting in a deterioration of living conditions, which has consequences for the physical or mental health of the person being harassed. Harassing a person through repeated words or behaviour with the aim or effect of degrading their living conditions and resulting in an alteration of their physical or mental health is punishable by one year's imprisonment and a fine of €15,000 when these acts have caused total incapacity for work for less than or equal to eight days or have not resulted in any incapacity for work."

According to the Labour Code, in Article L1153-1:

"No employee shall be subjected to:

1° Sexual harassment, consisting of repeated comments or behaviour of a sexual or sexist nature that either undermines their dignity due to its degrading or humiliating nature, or creates an intimidating, hostile or offensive environment for them; Sexual harassment also consists of:

a) When the same employee is subjected to such comments or behaviour from several people, in a concerted manner or at the instigation of one of them, even if each of these people has not acted in a repeated manner;

b) When the same employee is subjected to such comments or behaviour, successively, from several people who, even in the absence of concerted action, know that these comments or behaviour constitute a repetition;

2° Or assimilated to sexual harassment, consisting of any form of serious pressure, even if not repeated, exerted with the real or apparent aim of obtaining an act of a sexual nature, whether sought for the benefit of the perpetrator or for the benefit of a third party."

C. Abuse

The term 'abuse' is not used in the Penal Code, which refers more specifically, linking them to criminal penalties, to: crimes or offences against physical integrity, or deprivation, ill-treatment, assault, sexual abuse, etc. The terms violence and abuse were nevertheless adopted by the Council of Europe in 1987, with reference definitions that were subsequently adopted by France. The Council of Europe went further in 1992 by characterising the different types of abuse. From a criminal law perspective, abuse is considered particularly aggravated when committed against 'vulnerable persons', a legal term referring to vulnerable groups (Articles 222-3, 222-9 and 434- 3 of the Criminal Code):

- 'minors'
- persons who *"are unable to protect themselves due to their age, illness, infirmity, physical*

or mental disability, or pregnancy' and whose 'particular vulnerability is apparent or known to the perpetrator (editor's note: perpetrator of the assault)"

D. Reporting

With regard to reporting, the Criminal Code (Article 223-6) and the Social Action and Families Code (Article D. 226-2-2) state: *"All associations have an obligation to report incidents. The Criminal Code punishes both the failure to prevent a crime or offence against the physical integrity of a person and the failure to provide assistance."*⁶

IV. Responsibilities of stakeholders and commitments

A. Responsibilities of the actors

1) Responsibility of the organisation

The Board of Directors (BoD) is responsible for protecting the actors mentioned in Part V. It is the responsibility of the VoxPublic BoD to appoint a person from among its members to act as a contact person responsible for managing protection issues and incidents, who will be able to receive reports and manage the incidents. If the appointed person has a conflict of interest with regard to the reported incident, another person will be appointed on an ad hoc basis.

The Board of Directors is committed to zero tolerance towards acts of abuse, malice, harassment, discrimination, violence and disrespect.

2) Responsibility of the collaborators⁷

⁶ <https://www.associationmodeemploi.fr/article/les-associations-doivent-signalier-les-mauvais-traitements.74492>

⁷ That is to say, any person under contract – employee, intern, apprentice,

All employees (staff, interns, apprentices, etc.) are required to adhere to and sign the protection policy. The recruitment process and employment contracts refer to the protection policy. Once a year, during the annual appraisal interview, each employee and the national representative can assess compliance with these principles and evaluate the protection frameworks. Concerns can be raised at any time, and staff meetings regularly address the issue of 'team well-being', particularly during the most stressful periods. As such, the protection policy is evaluated annually and updated according to new issues and risks identified. On a daily basis, the national representative must ensure compliance with these principles. The national delegate reports to the appointed person and then to the entire Board in the event of a breach.

At any time, any employee may contact the designated person within the Board directly if they believe they are a victim or witness of acts that contravene the organisation's principles and values (see *II. Values and principles of the organisation*). For this reason, every employee has access to the personal contact details of the designated person within the Board of Directors.

3) Responsibility of partners

VoxPublic will provide the protection policy as an appendix to any new partnership agreement and will ensure compliance with it throughout the partnership relationship.

B. Commitments

VoxPublic undertakes to:

- Adopt a protection policy
- Disseminate the protection policy in a transparent manner and make it available on its website.
- Apply the protection policy through a series of procedures and measures to ensure the protection of actors (see *V. Risks, concrete measures, and protection procedures*).
- Provide adequate information to employees when they join the organisation.
- Gather all relevant information about a candidate during recruitment in order to prevent risks and ensure the protection and respect of all.
- Ensure the rapid implementation of protective procedures (see *V. Risks, concrete measures, and protection procedures*) in the event of allegations of alleged breaches of the protection policy.
- Impose sanctions on those who do not comply with the commitments made under this policy, in accordance with the provisions of French law, including those relating to the protection of whistleblowers at work⁸.

V. Risks, concrete measures, and protection procedures

consultant, volunteer

⁸ see. Articles L4131-1 to L4131-4 of the Labour Code

In order to ensure compliance with these values, principles and legal requirements, a series of measures and procedures have been put in place. On the one hand, preventive measures have been implemented to anticipate major risks that have already been identified. However, this is not an exhaustive list. On the other hand, VoxPublic implements a comprehensive protection policy to guarantee a healthy, respectful, fair and rewarding environment for its team and partners through various protection procedures. The protection policy is based on the following principles:

A. Identified risks and preventive measures

The identification and definition of major risks are accompanied by a series of preventive measures to anticipate and limit them as much as possible.

1) Diversity, equity inclusion

Risk:

The organisation pays close attention to issues related to diversity, equity, and inclusion, as it considers it essential not to reproduce discrimination that already exists in society (see “Non-discrimination” in *II. Values and principles of the organisation*). The possible risks are:

- The exclusion of people from minority groups by not representing them at events,
- The absence of opinions from people from minority groups due to a lack of representation or listening,
- The inaccessibility of documents and deliverables to people who are neuroatypical or disabled,
- The reproduction of social oppression in the practices and operations of the organisation.

Prevention:

- In this regard, the organisation is particularly vigilant in ensuring that non-discrimination and diversity are respected within VoxPublic's decision-making bodies. This is why it wishes to maintain a diversity of ethnic and social backgrounds among the members of the Board of Directors. VoxPublic has also created an “Agora” grouping together around 80 people who meet on a voluntary basis once or twice a year to contribute to VoxPublic's strategic thinking. The VoxPublic board of directors pays close attention to the diversity of Agora members (age, gender, social and ethnic backgrounds, etc.).
- VoxPublic promotes this diversity in all public events organised by the association, particularly those that include public speaking.
- In order to promote accessibility, VoxPublic attempts to apply Easy-to-Read and Easy-to-Understand (FALC) formatting standards in its documents.
- In order to promote accessibility, VoxPublic attempts to apply the Easy to Read and

Understand (FALC)⁹ standards in its documents.

- The organisation is particularly vigilant about gender issues and ensures that inclusive language is used (to avoid the use of the neutral masculine¹⁰ as much as possible) in its documents and tools.
- VoxPublic is also sensitive to the integration of people with disabilities. It provides specific contracts for employees with disabilities. Workplaces and meeting rooms are accessible.
- VoxPublic is also sensitive to the integration of people with disabilities. It arranges specific contracts for these employees with disabilities. Workplaces and meeting rooms are accessible to people in wheelchairs or with walking difficulties.

A detailed, analytical assessment of these various points is presented by the permanent team and discussed each year at a Board meeting.

2) Prevention of burnout syndromes and well-being at work

Risks:

Solidarity professions are often vocational, requiring a significant investment and in which the boundaries between the professional and private spheres can become blurred, where work and

voluntary activism can become intertwined to the detriment of personal life and with the risk of violating labour legislation regarding the right to rest. Without clearly established limits on the part of the organisation, this can lead to employee exhaustion, also known as "*professional burnout*" or "*burnout*" (see "Creating a healthy work environment" in II. *Values and principles of the organisation*).

Prevention:

- Team meetings are organised to discuss how to work better and develop a better working environment. The issue is raised during team workdays, which take place at least twice a year and as often as necessary during weekly team meetings.
- The association ensures compliance with labour laws and the right to rest: overtime and weekend work are limited and fully compensated within a reasonable time frame, preferably a short one.
- Special attention is paid to the "right to disconnect" to ensure peace of mind for team members who do not work full-time and/or on their days off.
- Particular attention is paid to the "right to disconnect", to ensure peace of mind for team members who do not work full-time and/or on their days off, recovery days, evenings, etc.

⁹ <https://www.culture.gouv.fr/Thematiques/Developpement-culturel/Culture-et-handicap/Facile-a-lire-et-comprendre-FALC-une-methode-utile>

¹⁰ For the Académie française, "the neuter, in French, takes the form of the unmarked gender, that is to say, the masculine." The masculine is given a generic value, as if it were neuter. The masculine is given a generic value, as if it were neuter.

- Attention is paid to management in order to enable a coordinated distribution of workloads, areas of responsibility, and work schedules for each individual. This translates into the organisation of a weekly meeting with the entire team and an alert system in case of excessive workloads.
- Proposals for new partnerships/projects are discussed in advance among team members, analysed in terms of workload, and submitted to the board of directors for approval.

A review of these various points is presented by the permanent team and discussed each year at a Board meeting.

3) Violence, harassment or abuse between actors

Risks:

No sexist, patriarchal, discriminatory, or violent behaviour, nor any form of harassment, is tolerated at VoxPublic. Working in teams, sometimes remotely, and in partnerships can lead to situations of interpersonal tension. These must be managed in a spirit of kindness and non-violent communication¹¹. The association also seeks to avoid any risk related to sexist and sexual violence. (See “Non-discrimination” in *II. Values and principles of the organisation* and *III. Legal requirements*)

Prevention:

- Employees can discuss this during weekly team meetings. This may also involve organizing individual listening sessions with a third party, paid for by the association and chosen by the Board of Directors.
- Establishing rules for activities, as well as setting aside time to explain the appropriate attitudes and behaviors to adopt, can help prevent this risk.
- Post-hoc analyses of situations and practices can also help prevent potential tensions and excesses. These situations and practices will be taken into account during the annual evaluation of the protection policy (see *IV. B.2*)

A review of these various points is presented by the permanent team and discussed each year at a Board meeting.

4) Inappropriate postures between actors

Risks:

¹¹ This mode of communication promotes harmonious cooperation and the resolution of potential conflicts. It is based on respect and listening to the person you are talking to, whether they are a loved one, a colleague, or a stranger. It consists of four phases:

Phase 1: Observe without evaluating or interpreting

Phase 2: Identify and express your needs and feelings.

Phase 3: Make a sincere request without demanding.

Phase 4: Receive with empathy.

During workshops or organised events, or even during follow-up, VoxPublic staff or partners may adopt one or more inappropriate attitudes, such as:

- Establishing a relationship of authority between one party and another that does not promote respectful dialogue.
- Any attitudes or behaviours that would lead to speaking on behalf of the people concerned (see "Valuing the opinions and expertise of partners" in *II. Values and principles of the organisation*)
- Over-investment or over-solicitation of VoxPublic during a campaign, which leads to an imbalance in the partnership relationship.
- Failure to comply with the partnership framework previously determined in a partnership agreement.
- Behaviour contrary to this charter on the part of partners during public events organised by VoxPublic.

Prevention:

- Evaluation periods with the different parties are necessary in order to collect feedback.
- Partnerships are accompanied by team meetings to set clear and collective limits on the position to be adopted. These meetings must be held before, during, and at the end of a partnership. A partnership agreement defines the terms of the partnership.
- When behaviour contrary to this charter is observed in a partner, particularly with regard to VoxPublic members or during public events involving VoxPublic, association members are invited to share their concerns with other VoxPublic members, and a collective response is proposed to VoxPublic, or during public events involving VoxPublic, the members of the association are invited to report it to the other members of VoxPublic and a collective response is proposed to report the problem to the partner. A review of these various points is presented by the permanent team and discussed each year at a board meeting.

5) Unwanted media exposure and hate on social media

Risks:

During campaigns conducted with partners, it is possible that one or more people may find themselves exposed in the media and/or on social media and become the target of malicious individuals.

Prevention:

- The prior consent of the individuals concerned is obtained and the use of images is precisely defined (usually through a consent form).
- Advice on media exposure is given to partners.
- When violations against individuals are identified, particularly cyberbullying, VoxPublic refers its partners to practical advice that has already been used and

referenced in guides produced by the association, or to legal advice and lawyers.

A review of these various points is presented by the permanent team and discussed each year at a board meeting.

6) Inadequate protection of sensitive data

Risks:

During campaigns conducted with partners, but also in the context of the data used by VoxPublic on its website, there is a risk of inadequate protection of personal data.

Prevention:

- The use of secure email and exchange loops for the management of sensitive information during a project is systematic.
- In order to avoid any risk of personal data leaks, the organisation pays particular attention to the rules of the GDPR (General Data Protection Regulation).

A review of these various points is presented by the permanent team and discussed each year at a board meeting.

B. Protection procedures

In order to implement an effective protection policy, the organisation does not only put in place preventive measures for identified risks. It also adopts a series of procedures to ensure compliance with its protection policy for the actors mentioned in section I.C.

1) Training

Offered to employees: training courses, provided by external service providers, on the points below may be offered to employees according to their needs and at least once every two years.

2) Incidents and complaint management

Internal reporting via an incident report form for acts of harassment, abuse, and discrimination.

- Organisation of a review procedure by the national delegate and/or the resource person on the Board of Directors in cases of gender-based and sexual violence, as well as any other incident that allows for (the list below is not necessarily exhaustive):
 - Removal of the perpetrator (and not the victim)
 - Listening to and caring for the victim (including emergency care and calling

- specialised services)
- Establishing the facts and gathering material evidence
- Establishing the facts and gathering evidence with a view to reporting the incident to the judicial authorities by the contact person and the victim (with a copy of the witness statement)
- Monitoring of the situation by the Board of Directors
- In the case of a volunteer member of the association, initiation of an expulsion procedure
- If the person is a salaried employee, implement the provisions set out in the labour code (suspension, dismissal, etc.)
- .
- For employees, hold an annual individual interview to prevent or review incidents and improve the protection policy

3) Recruitment process

- Inclusive recruitment process is in place
- Recruitment activities are carried out only when the association has sufficient resources to offer stable and decently paid positions in view of the cost of living
- Interns and apprentices will be integrated into the team
- Employment contracts have clear conditions regarding the protection policy
- Awareness-raising and training on the protection policy for new recruits

4) Working environment

- Presumption of goodwill in tense situations in order to avoid any form of abusive accusation and to prioritise communication
- Team meetings dedicated to the work environment and to sharing successes, difficulties, and concerns (at least twice a year during team workdays and as often as necessary during weekly meetings)
- Mechanisms for evaluating and replicating best practices that are identified during team meetings.
- Decision-making by consensus as much as possible, both at the association level and among the team of employees (see “Creating a healthy work environment” in *II. Values and principles of the organisation*)

5) Well-being

- Celebrating victories
- Respecting contractual working hours, ensuring that the team is not overloaded
- Collective time at association level (team, board, Agora, etc.), at least once a year to develop a collective vision of the association's project.
- Balance between on-site working time and teleworking according to the agreements established between VoxPublic, as employer, and the employees. (see “Creating a healthy working environment” in *II. Values and principles of the*

organization)

6) Partnership relations

- For each new partnership, establish a partnership agreement outlining the needs, objectives, expectations, limitations, and roles of each party in the partnership.
- Decision-making process in which the individuals concerned decide for themselves whether they wish to take a risk. In the context of a risk that has been assumed and taken, collective intelligence work to identify the risk and limit its effects.
- Dissemination of complaint and incident management channels to partners.
- Termination or non-commitment to the partnership if the employee team or the Board of Directors believes that the partnership could lead to burnout for an employee or intern, situations of violence, or discriminatory comments towards vulnerable groups or individuals. The feeling of safety must take precedence over the partnership. (See "Protecting the partnership and working together" in *II. Values and principles of the organisation*)

7) Equal footing with partners

- Definition of partnership relationships according to the requests and needs expressed by partners in a spirit of continuous training and transfer of skills and resources in order to strengthen the skills and empowerment of the partner in the medium term.
- Collaborative work (see "Valuing the voice and expertise of partners" *II. Values and principles of the organisation*)
- Making free digital tools available online to strengthen the capacity for autonomous action of citizens and associations.

8) Independence of the Organisation

- Commitment by the organisation not to affiliate itself with any political party or political figure, particularly during election campaigns. If a director or employee intends to participate in an election, as a candidate or member of a campaign team, that person shall inform the rest of the board as soon as possible to discuss the risks of conflicts of interest. If necessary, the director shall be asked to resign.
- Termination of relationships with funding organisations that attempt to exert influence over the strategic choices and positions taken by the organisation or its partners. (See "Independence" in *II. Values and principles of the organisation*)

9) Accessibility and inclusiveness

- Website accessible to visually impaired people

- Offices and meeting rooms accessible to people with reduced mobility Documents compliant with FALC standards (see “Inclusivity” in *II. Values and principles of the organisation*)

10) Protection of sensitive data

Use of software and digital tools that ensure data protection. (See “Digital Openness” in *II. Values and Principles of the Organisation*)

11) Sanctions

- In the event of non-compliance with this protection policy by a partner, termination of the partnership relationship.
- In the event of non-compliance with this protection policy by an employee, the incident will be handled by the Board of Directors, which will determine the appropriate sanctions in accordance with French law, and if necessary, refer the matter to the courts.

Document approved by the Board of Directors at its meeting on Thursday, January 25, 2024.