

## EUROPEAN UNIVERSITY OF MADRID DIVERSITY POLICY

### INTRODUCTION

The Diversity Policy of the European University of Madrid (hereinafter the University) is based on compliance with and defense of current legislation.

The Spanish Constitution recognised the equality of all persons without any discrimination on grounds of sex, ethnicity, religion, disability, age or sexual orientation, and specific regulations have been developed in relation to equal opportunities for people with functional diversity and effective equality between men and women.

As a result, and in line with the provisions of Organic Law 3/2007 of March 22, 2007, for the effective equality of women and men, there is a clear balance at the University both in the composition of the staff and in the various governing bodies of the company, where the percentage of representation of women to date exceeds 50%. This balance between men and women is also reflected in the composition of our students.

For its part, the Organic Law 2/2023, of March 22nd, on the University System, in article 97.2 of the LOSU *provides that "Private universities must have a university ombudsperson and equality and diversity units"*.

#### 1. Object

The University is an institution that eliminates borders and seeks to form global citizens with a multidisciplinary approach and ethical commitment that will help them in the development of their professional and personal competencies.

The University offers a student-focused Academic approach that promotes Training in values and Competencies for optimal professional development. To achieve this, it promotes diversity and fosters an inclusive environment that involves respecting and valuing individual differences as an enriching and key element in personal relationships.

The University is firmly convinced that diversity of Ability, culture, ethnicity, gender, sexual orientation, age, ideology, or any other socioeconomic condition, generates an environment of creativity, innovation and commitment that translates into continuous improvement. Therefore, our corporate culture is based on collaboration and respect, dignity and non-discrimination, and we promote equal opportunities among the members of our university community.

Among the values of the University are diversity and inclusion. Therefore, the University promotes an inclusive and socially responsible environment, valuing and respecting cultural and opinion differences. Inclusion is a daily practice that strengthens the educational community and allows us to move forward together towards success.

## 2. Principles of diversity

**Promote inclusion**, effective integration, avoiding any type of discrimination (direct or indirect) at work and in the classroom.

**Raise awareness** of the principles of equal opportunities and respect for diversity and their dissemination in the university community.

**Advance in the construction of a diverse community**: the university should promote the integration of people with diverse profiles (regardless of gender, sexual orientation, ethnicity, nationality, religion, beliefs, age, disability, etc.).

**Promote conciliation through a balance in work, family and leisure time**: organizations must establish mechanisms that allow the harmonization of work life with family and personal life of all employees, without making any distinction based on gender.

**Extend and communicate the institution's commitment to diversity**, which must be shared transversally by the entire institution to the entire university community.

**To publicize the activities in support of non-discrimination**, as well as the results obtained from the implementation of diversity policies in the institution's annual report.

## 3. Concept

Discrimination, harassment and any inappropriate behavior will not be tolerated and will be investigated, following the processes and rules of the institution.

The University is a dynamic institution, oriented to contribute value to its society and to actively contribute to its progress through students who seek to positively impact society. We were born with a restlessness, the desire to go further and we are constituted as an innovative University that forms, researches and promotes knowledge, culture and development.

The principles and values that are comprehensively reflected in this policy are evident in all our campuses and facilities.

The University expresses its commitment and conviction to maintain and promote diversity among its students, employees (faculty and administrative staff) and suppliers, **avoiding any form of discrimination, harassment or any type of inappropriate behavior among these stakeholders and at any level.**

Discrimination or harassment is defined as any conduct that, based on an individual's ethnicity, nationality, age, gender, sexual orientation, religion, functional diversity or marital status:

- Adversely affects teaching, learning, work, or participation in any other University activity.

- Is used as a factor in affecting or making a decision about teaching, learning, work activity or any other activity conducted at the University.
- Be employed for the purpose of interfering with the activity of teaching, learning, research, administrative work, or any other activity conducted at the University.

Taking into account these circumstances, the University articulates different preventive actions with the aim of avoiding behaviors that may negatively affect our employees or students, thus ensuring their professional or academic performance.

These include the approval of a Protocol against Sexual Harassment or Harassment based on sex and discriminatory harassment that is applicable to all students of the University for cases of sexual harassment or harassment based on sex and discriminatory harassment, which can be consulted on the University's website.

It also highlights the Pass of an Equality Plan that contains an ordered set of measures, adopted between women and men to eliminate discrimination based on sex, designed for all persons working at the University.

It is also noted that the University has a Code of Ethics that incorporates the prevention of labor and sexual harassment, under the principle that all people have the right to be treated with respect, dignity and justice, Therefore, it offers a workplace free of any form of harassment or harassment and shows its commitment to not admit any type of sexual harassment among employees or third parties with whom they may have a professional relationship of any kind, informing that appropriate measures will be taken to prosecute intimidating behavior, as well as those consisting of psychological or sexual harassment.

#### **4. Best practices to promote diversity and inclusion**

The University through this policy is committed to :

- Provide the student, without exclusions, the necessary tools so that they can develop those Competencies that will lead them to successfully overcome their university experience.
- Have a global, interactive and systematic vision of the problems.
- Promote the participation of its students in the curriculum and in the university community, through initiatives integrated in their Training and extracurricular activities.
- Be concerned with identifying and minimizing barriers to optimal learning and participation of all students.

Taking into account this framework, the University has defined as good diversity management practices those that include:

- A clear and defined process for planning and preparing teaching.

- Faculty attitude towards inclusion.
- Teaching-learning strategies to prepare and sensitize faculty.
- Teaching resources, spaces and materials that cater to diversity.
- Strategies to assess teaching activity and attention to diversity.
- Work methodologies that promote inclusion.
- Adapted systems for employee assessment.
- Making curricular adaptations in terms of time, activities, methodology and assessment techniques and tools.

## **5. Diversity as an Asset**

The University understands diversity as a source of added value.

To this end, it enriches the daily work in the classrooms and articulates the way in which the University's students, faculty and administrative staff carry out their day-to-day work on the University's campuses.

Diversity allows us to be recognised without bias, accept, value differences and take advantage of them to improve our academic proposal. In this sense, the University is committed to continue working to ensure an environment free of discrimination or any kind of harassment, thus defending the freedom and diversity of our university community.

The selection of students, the hiring of professors and administrative personnel, the recognition and development of these and any benefits or obligations generated, must be carried out without any bias. It is Core to work under the conviction in all areas of the University of the need to promote diversity. In addition to the commitment that the selection of students is not exclusive, the University provides the necessary tools and adjustments so that students can achieve the necessary competency development to successfully complete their academic experience.

In the admission process for students with functional diversity or with specific educational support needs, the Guidance, Diversity and Inclusion Unit is contacted so that it can determine the educational needs and guarantee the student's incorporation into the classroom.

## **6. Fields of action**

### **Age**

The University considers age diversity as a valuable asset among its employees. For this reason, we encourage the creation of teams in which different generations coexist. We are also convinced of the role that the University plays in lifelong learning, which is why the University ensures curricular adaptation to groups that have limited time for training.

**Gender**

The University promotes active policies for the effective equality of men and women among its students and employees, and ensures gender balance in its governing bodies.

**Sexual Orientation**

The University understands that sexual orientation or gender identity cannot be a reason for discrimination, harassment or persecution.

**Religion**

The University is a private and non-denominational institution and does not adhere to any ideology. In order to ensure religious coexistence and without exclusions in the University there are no facilities or resources intended for public religious worship.

**Specific educational support needs**

The University seeks equal opportunities and the inclusion of people with specific educational support needs. It promotes the development of skills, participation in the educational community and the insertion of its students in the labor market, thus ensuring the university experience to students who require different educational attention due to differences in their personal abilities of a physical, mental, cognitive, sensory or behavioral nature.

It is also committed to working with special employment centers and to promoting the specific development of each of its employees.  
specific development of each of its employees.

**Personal/family situation**

The University understands the existence of personal or family situations that may hinder the performance of its students and the achievement of its employees' objectives. Therefore, it aims to generate scenarios that provide the necessary flexibility so that students can continue their Training and its employees do not lose their jobs.

**6. Scope****6.1. Students**

As stipulated in the Organic Law of the University System, every student has the right to, among others:

To equal opportunities, without any discrimination whatsoever, in access to the University, admission to the centers, permanence in the University and the exercise of their academic rights.

To a design of academic activities that facilitates the reconciliation of studies with work and family life.

In this sense, the University has planned the following actions related to the prevention and protection of students' rights.

**Awareness activities, courses and workshops:** within the offer of University Activities for students, each year will include activities specifically aimed at raising awareness and training in the subject of diversity.

**Orientation, Diversity and Inclusion Unit:** the University offers the necessary support and advice so that students with specific educational needs can develop a university life under equal conditions. To this end, each case is individually addressed and, together with the faculty, the appropriate adjustments are made in order to achieve this objective.

**Schedules compatible with professional activity:** in the case of students whose personal situation requires timetable adaptations, the university will offer (whenever possible), groups in schedules compatible with such situations.

#### **Protection (action protocols)**

**University Ombudsperson:** is the person who defends and protects the rights of students within the teaching and administrative environment of the University, ensuring fair and equal treatment of all students.

**Norms of Coexistence:** the University regulates in its Norms of Coexistence the faults and sanctions associated with any student who does not respect the democratic principles, which include the equal rights of all persons, making specialization to the intolerance of xenophobia.

**Protocol against Sexual or Gender-Based Harassment and Discriminatory Harassment:** The University has a Protocol against Sexual or Gender-Based Harassment and Discriminatory Harassment that applies to all students in cases of sexual or gender-based harassment and discriminatory harassment, which is available on the University's website.

#### **6.2. Employees.**

In line with Spanish legislation, all human resources policies will be oriented and will ensure a management that promotes the creation of quality employment through responsible and respectful treatment in the professional context, and that promotes equal opportunities and diversity in its workforce.

The procedures for hiring, promotion, training, remuneration, etc., are designed to guarantee the quality of the processes and objectivity in decision-making, based exclusively on criteria of professional qualifications, experience and Competencies of the candidates in relation to the job position, and avoiding any discriminatory bias.

In accordance with the Workers' Statute in force in Spain, all workers have the right:

Not to be discriminated against directly or indirectly for employment, or once employed, for reasons of sex, marital status, age within the limits set by this Law, racial or ethnic origin, social condition, religion or convictions, political ideas, sexual orientation, membership or not of a trade union, as well as for reasons of language, within the Spanish State.

To guarantee equal opportunities for people with functional diversity, through objective selection processes, the outcome of which is based exclusively on the candidate's abilities, experience and professional Competencies.

To respect for their privacy and due consideration for their dignity, including protection against harassment based on racial or ethnic origin, religion or beliefs, disability, age or sexual orientation, and against sexual harassment and harassment based on sex.

In addition, the University carries out the following actions to favor the prevention and protection of these rights:

- 1) Guarantee equal opportunities through objective selection processes, the outcome of which is based exclusively on the candidate's abilities, experience and professional Competencies.
- 2) Promote the labor integration of people with functional diversity to favor their incorporation into our team of professionals, as well as adopt the necessary alternative measures with special employment centers, with the aim of complying with the provisions of Article 42 of Royal Decree Legislative 1/2013 on the rights of people with disabilities and their social inclusion.
- 3) Developing activities to raise awareness and inform employees about the various recognised disabilities, organizing conferences and Seminars on specific educational needs and promoting Training for students and faculty on the inclusion of students with specific educational support needs at the University.
- 4) The implementation of an equality plan that regulates and guarantees equal treatment and opportunities in employment and in which are determined:
  - Provisions aimed at eliminating discriminatory treatment that ensure the principles of equality.
  - Preventive actions to anticipate the detection of any type of discriminatory action or attitude.
  - Communication and awareness-raising programs aimed at equality education.
  - Action protocols with specific responses to any situation of sexual or labor harassment.  
of sexual or labor harassment.

- 5) Establishment of a system of indicators and statistics that allow for monitoring and an accurate diagnosis of the situation in order to, if necessary, develop and implement the necessary actions to ensure effective equality between men and women in all areas such as training, promotion, salary levels, etc.

Any University employee who feels or has suffered an act of discrimination or harassment, and who is afraid to report the facts, has the possibility of using the Europa Education Group's whistleblower channel, which can be accessed from its website.

### **6.3. Suppliers**

The University's commitment to diversity is also reflected in its hiring of suppliers.

#### **Special Employment Centers**

The University promotes supporting the contracting of services through Special Employment Centers, so alternatively, offers from suppliers who can offer their services through Special Employment Centers are valued.

Therefore, suppliers are invited to respond to the bidding document along with the relevant accreditations and any effects that may be derived from the work carried out through this type of Centers.

#### **RSC**

In accordance with the provisions of the United Nations Global Compact on Human Rights, Labor Standards and Environmental Protection, announced at the World Economic Forum in Davos, Switzerland, in January 1999, the bidder commits to respect human rights, labor standards, the environment and the fight against corruption. Although these factors are not part of the final assessment of the bids, there is a commitment to develop responsible supply chain management, including:

**Promote among the University's suppliers the acceptance of** and compliance with the principles of the Global Compact, as well as other aspects of Corporate Responsibility: Health and Safety, Quality and Environment, supporting diversity management as a business, social and legal imperative, in addition to complying with current regulations on equal opportunities.

**Promote responsible purchasing criteria**, both ethical and social and environmental, giving priority to those suppliers that promote fair trade, care for the environment and respect for human rights.



## 7. Support units

### 7.1. The Orientation, Diversity and Inclusion Unit.

The University has a **Diversity and Inclusion Orientation Unit for students** that promotes the inclusion of students with functional disabilities or specific educational support needs, and the equalization of opportunities, promoting their development of competencies, their full participation in the educational community and their insertion in the labor market.

This primary objective is represented in the following specific objectives:

- Promote universal accessibility on the University's campuses.
- To provide students with specific educational needs with the technical and human resources that allow them to take maximum advantage of their formative stage at the University within the real possibilities of the University.
- Make the appropriate curricular adjustments derived from the needs of each case, which do not imply alterations in the development of competencies to obtain the academic Degree.
- Sensitize the university community by organizing conferences and seminars on specific educational needs.  
Seminars on specific educational needs.
- To train students and faculty on the inclusion of students with specific educational support needs at the University.  
specific educational support needs at the University.
- Collaborate with support institutions.
- Assess the needs of students and manage and coordinate all necessary actions to ensure equal opportunities for students.

In order to achieve these objectives, the **Diversity and Inclusion Orientation Unit for students** works in coordination with the Admissions, Student Services, Medical Service, Management Board, Department Management, University Ombudsperson and faculty in order to provide counseling during their Training at the University to students whose specific educational support needs derive from:

- Neurodevelopmental disorders (oral and written language disorders, autism spectrum disorder, autistic spectrum disorder, ADD, ADD, etc.).  
Autism spectrum disorder, attention deficit disorders with or without hyperactivity...).
- Sensory, organic, physical and motor disabilities.
- Psychological and/or psychiatric disorders (obsessive-compulsive disorder, anxiety disorders and depressive disorder...).

### 7.2. Equality Plan Monitoring Committee

The University has an Equality Plan whose objective is to achieve full equality between women and men throughout its structure and management policy, in order to correct and prevent potential future imbalances.

The general objectives of the plan are:

- To favor a company culture that allows the establishment of the principle of equal treatment and opportunities between women and men throughout the organization.
- Ensure equal access to employment for women and men.
- To guarantee the absence of direct or indirect discrimination on the basis of sex in the company.
- Facilitate the access of women and men to all categories and Departments of the company. To favor internal promotion and selection in order to achieve a balanced representation of women in the workforce.
- To train and inform the entire workforce on the subject of equal treatment and opportunities.
- Guarantee the principle of equal pay.
- Facilitate co-responsibility and the reconciliation of personal, work and family life in the workforce.
- Ensure the use of inclusive language in the company's internal and external communications.
- Promote equal opportunities at all organizational levels through Communication and Training actions.
- Preventing sexual and gender-based harassment in the workplace.

In order to ensure compliance with the Equality Plan and to follow up on the improvement actions linked to it, the Plan includes the creation of a Follow-up Commission that periodically studies and plans the different actions to be carried out, as well as the assessment of the actions already carried out.

The Follow-up Commission has the following functions:

- a) The promotion of the implementation of the Equality Plan, its interpretation, adaptation, and the concretion of its execution through the establishment of an action Timeline.
- b) The follow-up of planned actions and their degree of execution.
- c) The Assessment of the actions and their exposition in partial reports, both the Intermediate Assessment Report, halfway through the period of validity of the plan, and the Final Report, in accordance with article 20.3 of Law 9/2003, of April 2, for equality between women and men.
- d) The elaboration of conclusions, recommendations and proposals for improvement derived from the assessment, which will make it possible to define future actions and establish corrective measures.
- e) Advising the staff on matters of equality and responding to those issues, questions or suggestions regarding the plan that were made by the male and female workers.
- f) The resolution of conflicts arising from the interpretation and application of the Plan, with the understanding that in this case the intervention of the Committee will be mandatory, prior to going to the relevant jurisdiction.

- g) The dissemination to the staff of all the information on its implementation, follow-up and assessment considered relevant.
- h) The modification of the Equality Plan in the event of the causes established in the regulations or due to those circumstances that, affecting its compliance, may arise during the implementation of the negotiated measures.

## **8. Commitment**

### **Adherence to the Diversity Charter**

Promoted in Spain by the Diversity Foundation, the Diversity Charter -which already has more than 800 signatories- is a charter containing a series of principles to which organizations that wish to promote equality, respect for the right to inclusion of all people in the workplace and in society in general, regardless of their diverse profiles, and the recognised benefits of cultural, demographic and social diversity, voluntarily commit themselves.

The University has joined the Diversity Charter in what is a further step in the integration of diversity within the institution, an impulse towards all those initiatives aimed at promoting equal opportunities and anti-discrimination.

Among the principles included in the Charter and assumed by the University are the awareness of equal opportunities and respect for diversity; to advance in the construction of a diverse workforce, to promote inclusion with effective integration and to consider diversity in all Management Board policies.

The University assumes the responsibility of training young people who are going to join the working world and under this premise it is key that educational institutions commit ourselves to the implementation of policies that promote a work environment free of prejudice.