

EPHA ANTI-FAVOURITISM POLICY

August 2024



The European Public Health Alliance

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About the European Public Health Alliance

The European Public Health Alliance (EPHA), recognised as the leading European advocacy public health NGO, is an international not-for-profit association established in Belgium in 1993. With a mission to protect and improve public health in Europe, EPHA has grown into Europe's largest platform of civil society organisations working on health. EPHA is active in all policy areas that affect health, either directly via health policies, or across areas that have an impact on health, including the social, economic, environmental factors, but also political and commercial determinants of health. In its work in the public interest, EPHA is independent from commercial funding.

What sets EPHA apart from other EU public health NGOs is its membership and its audiences. EPHA can proudly claim to be a people's platform for public health – set up by people and for people. Among its broad and versatile membership, EPHA hosts European umbrella organisations, national and regional organisations, but also the smallest of local grass roots. Its members include organisations of (public) health professionals, researchers, educators, and patients, organisations focusing on specific diseases (like cardiovascular or cancer), or on specific health threats (like tobacco or alcohol), and, importantly, an array of organisations that represent vulnerable population groups.

Notably, EPHA's nurses, doctors, scientists are not there to talk with each other - for that, they have their own professional associations. They are in EPHA to get involved in people's voice, to talk with people and to work for people.

The quest that unites such a diverse range of organisations is the right to health and combating exclusion or discrimination of anyone in Europe.

EPHA's mission

The mission of EPHA is to bring together the public health community to provide thought leadership and facilitate change, to build public health capacity to deliver equitable solutions to European public health challenges, to improve health and reduce health inequalities.

Purpose of the anti-favouritism policy

The purpose of this policy is to avoid favouritism, the appearance of or potential for favouritism, and conflicts of interest and loyalty often associated with favouritism. Favouritism in all its forms, including nepotism and cronyism, is inconsistent with EPHA's longstanding policy of making employment and business decisions based on organisation's needs, and individuals' qualifications, skills, ability and performance.

This policy does not encourage, although it does not prohibit EPHA from simultaneously employing friends and relatives, or engaging in professional activities with the friends and relatives of Team and Board members, or EPHA members.



This policy is in addition to EPHA's Code of Conduct on Conflict of Interest, EPHA's Diversity and Inclusion Policy, and EPHA's Whistleblower Policy.

Definitions

Favouritism

Favouritism is a situation in the workplace in which an employee receives preferential treatment over others (i.e. is granted privileges or spared consequences) based on a personal association and not on their merit and performance. The bias behind favouritism can stem from a family relationship (nepotism), from an acquaintance/friendship (cronyism), or from a variety of other factors (e.g. personal preferences, loyalty, in-group bias) beyond qualifications. People naturally gravitate toward those who are similar to them, loyal to them, or have characteristics they admire, but if these preferences are left unchecked, they can lead to favouring some individuals and alienating others.

Favouritism in the workplace, while unethical, is not illegal. However, Belgian labour law protects employees when favouritism progresses into prohibited behaviour. Favouritism becomes illegal when it leads to:

- Discriminating against employees for their protected characteristics, such as gender, race, age, (dis)ability, or religion;
- Reprimanding employees for not tolerating verbal, physical, emotional, or sexual harassment;
- Retaliating against employees for acts such as filing complaints or organising a union action;
- Violating company policies or employment contract terms.

Nepotism

Nepotism is a form of favouritism in the workplace based on kinship, which typically consists of making employment or business decisions based on a family relationship, and not on person's qualifications, skills, ability, and performance. Family relationship includes the spouse, domestic partner, anyone in a romantic relationship and, whether by blood, adoption, marriage or domestic partnership, the child, parent, grandparent, sibling, grandchild, aunt or uncle, niece or nephew, or any person residing in the immediate household (or the household of the spouse or domestic partner of any of these relatives) of a member of EPHA Team or Board.

Cronyism

Cronyism refers to the act of favouring coworkers, acquaintances, or associates based on personal connections instead of actual performance criteria. This practice entails providing undue benefits, such as promotions and appointments, lighter workloads, and other favourable work conditions.

Cronyism can come in two forms: vertical (favoured by superiors) and horizontal (favoured by colleagues). Vertical cronyism occurs when leaders or superiors favour their subordinates, completely ignoring performance-related factors. Favoured individuals can receive better projects or



opportunities, or undue promotions or advancements beyond what's merited. Horizontal cronyism happens when colleagues or peers within the same level favour each other based on personal connections rather than merit. Horizontal cronyism involves forming alliances to influence decisions, covering for shortcomings, and sharing confidential information to gain an advantage.

Decision making

Decision making related to favouritism includes the employment and human resource (HR) decisions, as well as business decisions within EPHA.

Employment and HR decisions include the full spectrum of employment related actions, including but not limited to decisions related to hiring, supervision, direction of work, promotion, compensation, work hours, performance evaluation, termination, and all other terms and conditions of employment related actions.

Business decisions are related to the full spectrum of EPHA's activities e.g., purchasing, commissioning, contracting, outsourcing, or otherwise involving the expenditure of EPHA budget or the use of its resources.

Prohibition against all forms of favouritism

The fundamental goal of this policy is to mitigate actual and perceived favouritism and conflicts of interest and loyalty by establishing appropriate processes for HR and business decisions.

No EPHA Team or Board member may make, participate in, or attempt to influence HR or business decisions based on personal connections or family relationships rather than merit, or pressure or cause others to do so.

Safeguards

If EPHA Team or Board member's friend or relative is employed by EPHA, becomes an intern at EPHA, or engages in professional or commercial activities with EPHA (e.g. as a consultant or service provider), the relationship will be disclosed in the Conflict of Interest Disclosure Form and the individual(s) in question will commit to compliance with EPHA Anti Favouritism Policy.

Employees and interns must self-report in writing to their direct line manager before they make, participate in, or attempt to influence (or cause others to make, participate in, or attempt to influence) decisions covered by this policy. If the relationship involves an employee in a leading position in EPHA, the report must be made in writing to the next most senior leader to whom the individual is accountable.

In case a person in personal connection or family relationship with EPHA Team or Board member is engaged with EPHA as an employee or intern, a plan must be put in place that:



- addresses reporting relationships, supervision, and evaluation in a way that will assure that there will be no participation in HR and business decisions or actions as prohibited by this policy;
- establishes a review and approval process for expenditures to sufficiently mitigate or preclude favouritism or the appearance of favouritism.

If an individual is to be assigned to a position that is under the supervision or control of a friend/relative who has or may have a direct effect on the individual's progress or performance, or an individual is to be assigned to a position with the same immediate supervisor as a relative, a plan will be devised to mitigate possible conflicts of interest. The plan will be approved by the Board. Ideally, in case of direct reporting or supervisory relationship between friends and relatives, the HR decisions will be transferred to another supervisor.

A plan will also be put in place when an individual already in a position of authority becomes a relative of a supervisor, subordinate, or someone who works for the same immediate supervisor.

Legitimate issues may arise and thus must be disclosed and managed under this policy with regard to:

- individuals who do not fit the definition of personal connections and family relationships provided in the definition section, but there is a reason to believe that their engagement could still be contentious under this policy;
- situations where the employee or intern is directly or indirectly involved in EPHA's engagement or potential engagement (e.g. as a contractor) of a friend or relative.

Responsibility for the policy

Overall accountability for upholding the terms of the Policy lies with the Director General. The entire EPHA Team is bound by the terms of this Policy and responsible for its implementation.

This policy is permanently featured on the EPHA website, in the Induction Package, and the EPHA Processes and Templates Overview Document for easy reference, and formally endorsed by top management, ensuring transparency and reinforcing our leadership's commitment to its implementation.

Finally, all EPHA employees are responsible for treating others with dignity and respect.

Compliance

To ensure continuity and appropriateness, periodic review and, as needed, revision of the approved plan should occur at least annually, and/or whenever there is a relevant change in reporting relationships. If the relationship involves the leader of an organisational unit, the plan must be reviewed and approved by the organisational leader to whom that unit leader is accountable.



This policy applies to instances of favouritism that existed before the enactment of this policy. Any existing relationships or situations must be disclosed immediately, evaluated, and managed as provided in this policy.

Concerns or complaints about possible violations of this policy should be submitted to EPHA President and/or Director General.

Violations of this policy may result in disciplinary measures up to and including termination of employment, or removal from the Management Board.

For further information see EPHA's Code of Conduct on Conflict of Interest, EPHA Inclusion and Diversity, EPHA Whistleblower Policy