

PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE



BCBL

Basque Centre on Cognition, Brain and Language

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
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INDEX

1. GENERAL & SPECIFIC OBJECTIVES.....	3
2. HISTORICAL AND LEGAL FRAMEWORK FOR LABOR	3
3. LGBTIphobia IN THE WORKPLACE	6
4. COMMITMENT.....	8
5. REPRESENTATIVE PANEL – NEGOTIATING COMMITTEE	9
6. APPLICATION SCOPE	10
7. ACTION PLAN: MEASURES TO RESPECT THE RIGHTS OF LGBTQI+ PEOPLE & PREVENT VIOLENCE AND DISCRIMINATION ON THE GROUNDS OF LGBTQI+PHOBIA AT WORK	11
8. LGBTQI+PHOBIA PREVENTION PROTOCOL	17
9. GLOSSARY	33
10.- RELEVANT CONTACT INFORMATION	36
11.- ANNEXES.....	38

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

1. GENERAL & SPECIFIC OBJECTIVES

The general objective of this plan is to guarantee rights of real and effective equality to LGBTQI+ individuals within BCBL's academic and work environment.

Specific Objectives:

- Establish specific policies to prevent and/or prosecute any conduct or discrimination based on gender identity/expression, sexual orientation, and/or sexual characteristics and preferences.
- Promote a work environment that is free and respectful of diversity, the LGBTQI+ collective and specifically trans people.
- To familiarize the center's employees with LGBTQI+ rights, as well as inform them of the present plan and action protocol.

A note regarding the acronyms used in this document: Although the law requires an LGTBI plan, in order to broaden the diversity umbrella, the BCBL has chosen to create an LGBTQI+ plan, where there is room for *“Queer/Gender Queer”* people, or those who do not identify with any of the categories mentioned in LGBTQI+ (“+”). In the text, the acronym “LGBTQI+” will be used when referring to the center's own plans. However, the acronym “LGBTI” will be retained when referring to the legal framework or statistics that have used that acronym.

2. HISTORICAL & LEGAL FRAMEWORK FOR LABOR

“Law 4/2023 of February 28, for the real and effective equality of trans people and the guarantee of the rights of LGTBI people” stipulates change in the treatment of sexual, family, and gender diversity and LGBTI people, especially in the workplace. **Companies with more than 50 workers are obligated to** establish collective bargaining measures planned to advance equal treatment and opportunities afforded to LGBTI people.

Although intervention must go deeper to reach all social strata, LGBTI plans arise from the need to **address LGBTI+phobia in the workplace**. The workplace remains the last place where diversity has not been pursued, with respect to its regulations. Incorporating diversity into this space will contribute towards eradication of LGBTIphobia in society. According to “The report on the evolution of hate crimes” made by the Ministry of Interior in 2022, ‘hate crimes related to

 <small>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</small>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
--	---	---

sexual orientation or gender identity, are the second most frequent [hate crime] in Spain' (Ex. 459 crimes in 2022).

Data on discrimination against LGBTI individuals in companies indicates it is essential to adopt clear measures in order to prevent and act against: (1) violence and (2) elimination of discriminatory biases in treatment of diversity regarding access to employment and also during employment. To this end, it became necessary to approve and provide a protocol against LGBTQI+phobia in the workplace, which allows victims who suffer this kind of discrimination to act against it and its aggressors. In turn, this entails the need to create an internal policy that favors the inclusiveness of workers and prioritizes the elimination of hateful spaces within the framework of companies. Specifically, the measures should generate an **inclusive workspace, free of violence and hatred**. Ushering in a paradigm shift in company culture regarding **sexual, family and gender diversity**.

REGULATORY DEVELOPMENTS IN SPAIN

- **(Current) “Law 4/2023, of February 28, for the real and effective equality of trans persons and the guarantee of the rights of LGBTI persons”:** Introduces, for the first time, the obligation of companies to implement specific measures for prevention, detection and protection of LGBTI workers.
- **Royal Decree 1026/2024 of October 8** regulates LGBTI plans.
- **Royal Legislative Decree 2/2015, of October 23, 2015,** approves the text of the Workers' Statute Law. In article 4, subsection 2, it recognizes the right of male and female workers not to be discriminated against (directly or indirectly) for employment candidacy, or once employed, on the grounds of sexual orientation, sexual identity, gender expression and sexual characteristics. In paragraph ‘2e’ the law recognizes the right to respect of individuals’ privacy and consideration to their dignity.

PREVIOUS Approaches to protection of workplace diversity

- **Law 15/2022, of July 12, 2002, on equal treatment and non-discrimination in the workplace.**
- **Organic Law 3/2007, of March 22, 2007,** for the effective equality of women and men in the workplace. It has greater impact by establishing equality plans.

NOTE REGARDING THE BASQUE AUTONOMOUS COMMUNITY

- **Law 14/2012, of June 28, on non-discrimination on the grounds of gender identity and recognition of the rights of transgender persons (Euskadi).** The Basque autonomous community already had a previous autonomous trans law, being the second autonomous community to implement it, after Navarre (Foral Law 8/2017, of June 19, for the social equality of LGBTQI+ persons (Navarre)).

EUROPEAN LEGISLATION

- **European Council Directive 2000/78/EC of November 27, 2000:** This Directive establishes the right of equality to everyone under the law and affords

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

protection against discrimination (including discrimination based on explicit sexual orientation, yet it still lacks detail regarding protections for gender diversity), as it is a universal right recognized in the Universal Declaration of Human Rights. This directive urges all member states to apply this principle of equal treatment.

Another important fact related to workers' rights, specifically to the LGBTQI+ collective, is that only 30% of the agreements had a clause mentioning the LGBTQI+ collective. None of the agreements mentioned the trans collective.

3. LGBTIphobia IN THE WORKPLACE

While important advances have been made in regards to legal matters, multiple forms of discrimination are reproduced in the workplace and often normalized and/or go unnoticed:

- **Greater psychosocial risks** associated with LGBTI work.
- **LGBTI people**, and those who do not comply with socially associated stereotypes of being male/female, will **consciously or unconsciously look for jobs in sectors more respectful of LGBTI diversity**. In many cases their personal situation is kept hidden (“invisibility or self-imposed concealment”) for fear of being misunderstood by colleagues and superiors, and for fear of inequalities or loss of prestige. This means a loss of opportunities and talent for both LGBTI people and companies.
- Trans people may **give up transitioning and postpone their path to gender affirmation** indefinitely for fear of adverse reactions of their work environment and other work-related consequences (non-renewal of contract, less chance of promotion, etc.) due to possible consultations or medical leaves associated with the process.
- LGBTI people may **decide to get married during their vacation period**, thereby giving up their same-sex marriage leave. **Or decide not to attend medical appointments, or accompany their partner’s appointments**, for fear of reprisals at work.

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

Below are statistics that show the presence of LGTBiphobia at work, according to a study conducted by the UGT (Trade Union Confederation General Union of Workers of Spain) regarding “Discrimination towards LGBTI people (2023)”:

- **51% of LGBTI people hide their sexual orientation at work** (even if they have made it public in their social and family environment) (*“Dissociation of private and personal life”*)
- **44% of LGBTI people hide their sexual orientation to find employment.**
- **75% of LGBTI people consider being LGBTI a disadvantage in accessing employment.**
- **55% of LGBTI people considered it a disadvantage to be LGBTQI+ in relation to being promoted at work.**
- **20% of LGBTI people recognize that their dissociation between private life and work causes them to stress and experience anxiety.**
- **70% of LGBTI people withhold reporting aggressions to their superiors at work.**
- **62% of trans people did not receive any type of support in regards to their work environment during their transition.**
- **70% of trans people consider that they are not socially accepted.**

LGBTIPHOBIA AND TYPES OF LGBTIPHOBIA

LGTBIPHOBIA: Any attitude, behavior, or speech of rejection, repudiation, prejudice, discrimination, or intolerance toward LGTBI individuals because of their identity or perceived identity. (BOE)

Examples of LGBTIPHOBIA harassment conduct

- **Homophobia:** Any attitude, behavior, or speech exhibiting rejection, repudiation, prejudice, discrimination, or intolerance toward homosexual individuals for their identity or perceived identity. (BOE)
- **Lesbophobia:** Specific discrimination towards lesbian women, who are exposed to more discrimination than other women because they are homosexual and more discrimination than other homosexuals because they are women. In contrast to homophobia, violence directed at lesbian women often exhibits more sexual characteristics.

	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

- **Biphobia:** Any attitude, behavior, or speech exhibiting rejection, repudiation, prejudice, discrimination, or intolerance toward bisexual individuals because of their identity or being perceived as such. (BOE)
- **Transphobia:** Any attitude, behavior, or speech exhibiting rejection, repudiation, prejudice, discrimination, or intolerance toward transgender individuals because of their identity or being perceived as such. (BOE)
- **Intersexphobia:** Aversion and discrimination toward intersex individuals.
- **Plumophobia:** Discriminatory attitudes toward individuals with non-normative gender expression for not being considered sufficiently masculine or feminine by society.
- **Institutional LGTBiphobia:** Systematic and structural discrimination against LGTBI individuals by public or private institutions. It can manifest through laws, policies, norms, or practices of inequality and exclusion.
- **Cognitive LGTBiphobia:** The belief that LGTBI individuals are unnatural, immoral, sinful, and/or inferior and/or undesirable.
- **Selective LGTBiphobia:** Allowing the expression of sexual diversity in private spaces but never in public spaces.

4. COMMITMENT

BCBL shares the need to promote and respect diversity among its employees, taking advantage of the human, social, and economic potential that this diversity represents.


The BCBL is committed to:

- **Promoting** a heterogeneous workforce.
- **Creating** a safe and inclusive work environment.
- **Encouraging** the integration and non-discrimination of LGBTQI+ workers through specific measures in accordance with the provisions of Article 15.1 of Law 4/2023, of February 28th, for the real and effective equality of trans people and for the guarantee of the rights of LGBTI people.
- **Assuring** that the protocols on harassment and violence in the workplace extend to (and protect) LGBTI individuals in the BCBL.

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

5. REPRESENTATIVE PANEL – NEGOTIATING COMMITTEE

The present LGTBIQ+ Plan has been signed by the Negotiating Committee of the working group composed of workers' representatives, management, and HR called the **"HRS4R* & Equality Working Group"** (*HRS4R: Human Resources Strategy for Researchers*) of the BCBL. It is constituted by:

PERSON	REPRESENTATION	SIGNATURE
Laura de Frutos	Predoctoral Researcher representative	
Marco Flores	Predoctoral Researcher representative	
Drew McLaughlin	Postdoctoral Researcher representative	
José Pérez-Navarro	Postdoctoral Researcher representative	
Garikoitz Lerma	Associate Group Leaders representative	
Clara Martin	Group Leader representative	
Marie Lallier	Group Leader representative	
Larraitz Lopez	HR Manager	
Ana Fernández	BCBL General Manager	

Signed in San Sebastián, April 9th, 2025

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

6. APPLICATION SCOPE

The BCBL's LGBTQI+ Plan is applicable to all staff with an employment relationship at the center, regardless of their hierarchical position in the organization and the nature of their contract. It is also applicable to personnel carrying out research stays, university internships, training center internships, etc.

If the discriminatory and/or violent behavior occurs between BCBL employees and employees of an external company, who share the workplace, the procedure set out in this document will be applied.

 <small>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</small>	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
--	---	---

7. ACTION PLAN: MEASURES TO RESPECT THE RIGHTS OF LGBTQI+ PEOPLE & PREVENT VIOLENCE AND DISCRIMINATION ON THE GROUNDS OF LGBTQI+PHOBIA AT WORK

INFORMATION, AWARENESS AND COMMITMENT

OBJECTIVE			
Training and raising awareness of LGTBIQ+ rights in the workplace with special emphasis on equal treatment and opportunities and non-discrimination. Encourage the commitment of employees to accept the principles of the protocol.			
ACTIONS	INDICATORS	CALENDAR	RESPONSIBLE
1. Translation of the LGBTQ+ Plan and LGBTQI+phobia protocol into English for all personnel.	- English versions of the documents	MARCH 2025	JAKE VINNACOMBE
2. Dissemination of the LGBTQI+ Plan and LGBTQI+phobia protocol to all staff, new recruits, participants and companies that provide services at the facilities.	- Informational Email - Publication of Employee Handbook (wiki BCBL) - Included in the Welcome Plan for employees and visitors - Dissemination to collaborating companies (cleaning and maintenance)	APRIL 2025	HR MANAGER OIHANA VADILLO (Outreach)
3. Presentation (Talk) given regarding both the LGBTQI+ Plan and the LGBTQI+phobia protocol.	- Date and presentation format. - Attendees list, including information on positions held and gender (mandatory for middle management and personnel handling the selection process)	JUNE 2025	GENERAL MANAGER HR MANAGER
4. Add requirement of acceptance of the LGTBIQ+ plan to the contracting clauses.	- Updated recruitment template	JUNE 2025	GENERAL MANAGER

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

EMPLOYER BRANDING

OBJECTIVE			
Publicly disseminate BCBL's commitment to respect LGBTQI+ diversity and avoid discriminatory behavior in the workplace.			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
5. Publication in digital media spaces	<ul style="list-style-type: none"> - New section about the LGBTQI+ plan and protocol against LGBTQI+phobia on the BCBL website titled "What it's like to work at the BCBL" - Instagram post - LinkedIn post 	APRIL 2025	HR MANAGER OIHANA VADILLO (Outreach)
6. Creation of Logo " <i>LGTBIQ+ Safe Space</i> "	<ul style="list-style-type: none"> - Creation of specific logo - Add logo in publications related to Equality and HR - Add HR aspects in the footer of diffusion e-mails. 	JUNE 2025	HR MANAGER OIHANA VADILLO (Outreach)

 <small>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</small>	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
--	---	---

ACCESS TO EMPLOYMENT, CAREER ADVANCEMENT AND CAREER MAINTENANCE

OBJECTIVE			
Hiring and promotion practices based on merit and skills without discrimination of any kind, specifically regarding sexual orientation, gender identity and/or expression, sexual characteristics, or belonging to a LGBTQI+ family group. Ensuring inclusive perspective towards LGTBIQ+ people during all phases of the selection process.			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
7. Training on unconscious sexist and LGTBIQ+phobic discriminatory biases in research (mandatory for individuals participating in selection processes).	<ul style="list-style-type: none"> - Date and information about the training - List of people who attended 	OCTOBER 2025	HR MANAGER EXTERNAL COMPANY
8. Include LGTBIQ+ Plan in selection process guidelines	<ul style="list-style-type: none"> - Publication on internal BCBL WIKI - Update of OTMR guidelines (Open, Transparent and Merit Based Recruitment) and publish them on the center's website. - Published entries on job portal for candidates 	August 2025	HR MANAGER
9. Guarantee the preservation of the right to privacy of individuals in the selection process by prohibiting invasive questions about personal and family life, sexual orientation, gender identity and/or expression, sexual characteristics and marital status.	<ul style="list-style-type: none"> - New OTMR guidelines - Inform Personnel that participate in job interviews 	August 2025	HR MANAGER

 <small>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</small>	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
--	---	---

COEXISTENCE, DIVERSITY and RESPECT

OBJECTIVE			
Preserving verbal/written non-discrimination internally and externally			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
10. Training in gender-neutral language for translation, documentation supervision and outreach personnel	<ul style="list-style-type: none"> - Training dates and attendees - Inclusive language publications - Internal forms and reports featuring inclusive language 	May 2025	DREW MCLAUGHLIN

OBJECTIVE			
Promotion of a respectful work environment.			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
11. Prohibition of insults, humiliating or intimidating expressions and manners towards LGBTQI+ individuals. Especially towards transgender people.	<ul style="list-style-type: none"> - Add new guidelines to the “Standards for Good practices at work” document and update the internal wiki as well as printed posters throughout the center. 	MAY 2025	HR MANAGER DREW

 <small>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</small>	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
--	---	---

DISCIPLINARY REGULATIONS

OBJECTIVE			
Harassment prevention: Any adverse treatment as a result of filing complaints or initiating the harassment protocol due to discrimination or lack of equal treatment toward the LGBTQI+ community is strictly prohibited.			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
12. Incorporate the Protocol against LGBTQI+phobia and inform the investigating committee.	<ul style="list-style-type: none"> - Guidelines added to the protocol against LGBTQI+phobia - Send LGBTQI+ plan and LGBTQI+phobia Protocol to each member of the investigating committee each time a complaint is reported. 	JUNE 2025	HR MANAGER

LICENSES AND PERMITS

OBJECTIVE			
All the rights set out in the company's internal regulations that apply to the entire workforce shall also apply to LGBTQI+ people in the company, regardless of their partners or family dynamic.			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
13. LGBTQI+ rights written explicitly in the employee handbook	<ul style="list-style-type: none"> - Updated workers' manual 	May 2025	HR MANAGER

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
---	---	---

MEASURES IN THE FIELD OF OCCUPATIONAL HEALTH AND PSYCHOSOCIAL RISKS

OBJECTIVE			
Include LGBTphobia in the assessment of occupational risks .			
ACTION	INDICATORS	CALENDAR	RESPONSIBLE
14. If the next evaluation is by an external company, request to include it.	- Factor LGBTphobia included in evaluation of work hazards	If the case is presented	HR MANAGER EXTERNAL COMPANY GENERAL MANAGER

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

8. LGBTQI+PHOBIA PREVENTION PROTOCOL

8.1 THE REGULATION:

Article 15.1 of Law 4/2023, of February 28, for the real and effective equality of trans people and the guarantee of the rights of LGBTI individuals, establishes that companies with more than fifty employees must implement a set of measures and resources to achieve real and effective equality of LGBTI people, including an action protocol for addressing harassment or violence against LGBTI individuals.

8.2 OBJECTIVE

The objective of this protocol is to prevent, detect and act against discriminatory harassment based on sexual orientation, gender identity, gender expression, sexual characteristics, and belonging to a specific family dynamic, within the BCBL work environment.

8.3 COMMITMENT

- Comply with the Law 4/2023, of February 28th, for the real and effective equality of trans people and for the guarantee of the rights of LGBTQI people.
- Guarantee an inclusive work environment that safeguards the physical and moral integrity and dignity of the people within the BCBL's academic and work environment.
- All individuals covered by this protocol are responsible for contributing towards maintaining a harassment-free work environment, especially people who manage teams and oversee others.
- Equal treatment and non-discrimination of all employees.
- Review and update the protocol in response to new legal requirements and/or proposals negotiated by the negotiating committee.
- Guarantee the privacy, confidentiality and dignity of the victim.
- Adoption of precautionary measures to temporarily separate the harasser and the victim during the proceedings.
- Awareness and collaboration to prevent harassment and discrimination against the LGTBIQ+ community in the academic and work environment of the center.
- All individuals covered by this protocol, including those involved, have the right to use this procedure with full guarantees, free from intimidation, unfair treatment, discrimination, degradation, or unfavorable conditions.

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

8.4 SCOPE OF APPLICATION

Applicable to all personnel with an employment relationship with the center and assigned to it, regardless of their hierarchical position in the organization and the nature of their contract. It shall also apply to personnel carrying out research internships, university internships, training center internships, etc.

If the discriminatory and/or violent conduct occurs between BCBL employees and employees of an external company, who share the workplace, the procedure set forth in this document shall apply.

8.5 VALIDITY

This protocol shall enter into force on the date of its signature and shall remain in force unless the signatory parties deem it necessary to modify it, or legal regulations require its modification.

8.6 NEGOTIATING COMMITTEE

The negotiating committee is composed of the members of the aforementioned “HRS4R & Equality Working Group”. Specifically, the representatives of the workers, HR and management of BCBL.

The signatories of this protocol express their commitment to preventing, avoiding, resolving, and where appropriate, sanctioning cases of discriminatory harassment based on sexual orientation, gender identity and/or gender expression, sexual characteristics, and family group membership that may occur in the workplace at BCBL and at all levels of the center.

Equality Committee / HRS4R & Equality Working Group

At the BCBL, the Equality Committee/HRS4R WG will act as an advisory and supervisory body in the procedures related to the prevention and management of situations of discriminatory harassment based on sexual orientation, gender identity, gender expression, sexual characteristics and family dynamics within the BCBL's work environment. This group will be composed of BCBL members with representation from different areas of the organization (administration/services, HR, Research). Its functions will be:

- Provide guidance and support to both complainants and the Intermediation Team in the management of cases.
- Supervision of actions: Ensure compliance with the principles of confidentiality, impartiality and diligence in all procedures.
- Suggested improvements: Periodically review the protocol to ensure that it is up to date with current regulations and aligned with the needs of BCBL staff.

	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

The identity and composition of this group will always be updated on the BCBL Wiki.

General Management

The management is comprised of the HRS4R & Equality Working Group and will be responsible for:

- Approval of the procedure's content and appointment of the figures.
- Providing resources to carry out the necessary training to implement the procedure.
- Carry out the actions proposed by the Arbitration Committee or other alternatives.
- To ensure that the defined actions are carried out.
- Facilitate the execution of actions through the provision of necessary resources.

8.7 COMMUNICATION AND PREVENTION

The organization must ensure that the conflict resolution policy is communicated to employees and visitors and that they have understood it. Additionally, that they know of their right to complain, and that there is a specific procedure and firm commitment to resolve conflicts.

To prevent and avoid situations of harassment at work, protocol dissemination Will be done through the following:

- The BCBL Wiki
- E-mail to everyone in the organization
- Posters, digital posters, main displays
- Annual HRS4R / HR Day meeting
- Welcome plan / employee handbook

To avoid situations that could violate the rights set forth in this document, the following guidelines will be followed:

- **Respect:** An atmosphere of respect and decorum shall be promoted at work. The use of insulting, humiliating or intimidating expressions and manners is prohibited.
- **Communication:** Attitudes that typically isolate or reduce normal communication between staff members are not permitted.
- **Reputation:** Any behavior aimed at discrediting or undermining the work or personal reputation of any member of staff is prohibited.
- **Discretion in repression:** Demands to rectify conduct of a person whose behavior has been found inappropriate shall be made in a discreet manner.

- **Non-arbitrariness:** Arbitrary or abusive distribution that cannot be addressed within working hours or would otherwise lead to dilution of functions is prohibited.
- **Uniformity and fairness:** The application of work control and performance monitoring mechanisms shall be uniform and fair, taking personal circumstances into account.
- **Avoidance of harassment:** Any adverse treatment resulting in the filing of complaints or lawsuits aimed to prevent discrimination or demand effective compliance with the principle of equality is prohibited.

8.8 TYPES OF DISCRIMINATION AND HARASSMENT

Harassment is an attack on the safety, dignity and health of individuals and also manifests itself in workplace relationships. **LGBTIphobia is understood as any physical behavior or speech intended to violate the dignity of a person—based on their sexual orientation, gender identity and/or expression, sexual characteristics or belonging to a family dynamic—**particularly when it creates an intimidating, hostile, degrading, humiliating or offensive environment.

Classification of TYPES OF DISCRIMINATION / HARASSMENT and associated terminology

- **Direct discrimination:** Situations in which individuals or groups they belong to may be treated less favorably than others in similar or comparable circumstances solely due to their sexual orientation, sexual identity, gender expression or sexual characteristics. The denial of reasonable accommodation to people with disabilities shall be considered direct discrimination. For this purpose, reasonable accommodation refers to necessary and appropriate modifications to physical, social and attitudinal environments that do not impose a disproportionate or undue burden. These modifications must be effective and practical in facilitating accessibility and participation, ensuring that persons with disabilities can enjoy and exercise all rights on an equal basis with others. (BOE*) *BOE = *Boletín Oficial del Estado* [Official State Gazette]
- **Indirect discrimination:** This occurs when an apparently neutral provision, criterion or practice causes or may cause a particular disadvantage to one or more individuals in relation to others based on sexual orientation, sexual identity, gender expression or sexual characteristics. (BOE)
- **Multiple and intersectional discrimination:** Multiple discrimination occurs when a person is discriminated against, either simultaneously or consecutively, for two or more grounds set forth in Law 15/2022, of July 12, 2002, on equal treatment and non-discrimination.
- **Intersectional discrimination:** occurs when various causes outlined in the previous section concur or interact, generating a specific form of discrimination (BOE).

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

– **Discrimination by association and discrimination by mistake:**

Discrimination by association occurs when a person or group, due to their relationship with another individual being subjected to discrimination based on sexual orientation, gender identity, gender expression, or sexual characteristics, is subjected to discriminatory treatment themselves. (BOE)

Discrimination by mistake occurs when it is based on an incorrect perception of the characteristics of the person or persons being discriminated against. (BOE)

- **Discriminatory Retaliation:** Adverse treatment or negative effects imposed on a person for filing a complaint, claim, or denunciation of any type intended to avoid, prevent, reduce, or denounce the discrimination or harassment they have been subjected to.

Classification of types of harassment according to the ACTIVE SUBJECT

- **Downward harassment:** The perpetrator has a dominant hierarchical position over the victim (from boss to subordinate).
- **Upward harassment:** The perpetrator has a hierarchical subordinate position to the victim (from subordinate to boss).
- **Horizontal harassment:** occurs when both the perpetrator and the victim hold neither a dominant nor a subordinate position in their relationship (partner to partner).

Other definitions associated with discrimination and harassment

- **Positive action measures:** differentiated treatment aimed at preventing, eliminating and, where appropriate, compensating for any form of discrimination or disadvantage in its collective or social dimension. Such measures will be applicable as long as situations of discrimination or disadvantages that justify them persist and must be reasonable and proportionate in relation to the means of their implementation and the objectives they aim to achieve. (BOE)

Examples of LGBTIphobia harassment behaviors

- **Heterosexism (or heteronormativity):** Taking for granted, without question, that the norm to follow is heterosexuality. This situation provokes thinking that everything that is not heterosexual is “abnormally different” and can provoke rejection or discrimination. It is a form of violence.
- **Homophobia:** Refers to aversion, hatred, fear, prejudice or discrimination against homosexual men or women, although it also includes other people who make up sexual diversity, such as bisexual and transsexual people. Homophobia

is linked to the dominant patriarchal culture, which also discriminates against women.

- **Lesbophobia:** Aversion, hatred, fear, prejudice or discrimination against lesbianism or lesbians, attitudes of rejection, irrational fear towards lesbian women.
- **Biphobia:** Aversion, hatred, fear, prejudice or discrimination against bisexuality or bisexual people.
- **Transphobia:** Aversion, hatred, fear, prejudice or discrimination against trans people.
- **Intersexualfobia:** Aversion, hatred, fear, prejudice or discrimination against intersexuality or intersex people.
- **Plumophobia:** Discriminatory attitudes toward individuals with non-normative gender expression for not being considered sufficiently masculine or feminine by society.
- **Monosexism:** The belief that all individuals are either homosexual or heterosexual. It is a biphobic attitude.

In short, LGTBphobia is a hostile attitude that perceives non-heterosexual sexual orientation, transsexuality and intersexuality as contrary, different, inferior, worse or abnormal and the people who practice it and/or are it, as different, bad, weird, sick, amoral or unnatural.

8.9 INTERMEDIATION TEAM

At the BCBL, the Intermediation Team Will be composed of two people from HR and two people from the Equality Committee/HRS4R WG to be assigned on a case-by-case basis. These Will be their roles and responsibilities:

- Act as the first point of contact to receive inquiries, complaints, or allegations related to harassment situations.
- Ensure confidentiality and protection of the rights of the people involved during the process.
- Provide information on the procedures established in the protocol
- Follow the procedures established in the informal and formal procedures (see later section).
- Participate in annual training sessions on equality, prevention and action against harassment.

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

The identity of these people Will always be updated in the BCBL Wiki

Substitution Procedures

The temporary or permanent replacement of a member of the Mediation Team will be carried out in the following cases:

- Temporary or permanent replacement of a member of the Intermediation Team shall be made in the following cases:
- Prolonged absence or temporary impossibility due to justified causes (medical leave, etc.).
- Express resignation to continue in the process, as long as it is duly justified.
- Decision of the bodies responsible for the process in the event of manifest irregularities in their performance.
- Incurring in any of the causes of abstention or recusal.

In any of these cases, the affected person shall be replaced by another member designated in such a way as to ensure the continuity, confidentiality and impartiality of the procedure.

Grounds for abstention and recusal

To guarantee the impartiality of the process, as well as a fair, transparent and unbiased investigation, the following causes for abstention and recusal are deemed appropriate:

- Conflict of interest with the complainant or respondent: The members of the investigating committee must not be related to or have a relationship of friendship or enmity with the persons involved in the complaint (complainant – respondent). In turn, a denounced person or denouncer shall be barred from intervening in other complaint procedures until the complete resolution of his/her own case.
- Close personal relationships (close friendship, expressed dislike, familial ties).
- Previous involvement in the case.
- Obvious lack of objectivity.

8.10 ACTION PRINCIPLES

The company must provide specific information/training to successfully perform their functions (legal information on the subject, social skills to manage conflicts, action procedures) to the members of the Intermediation Team and the members of the equality committee/HRS4R WG, enabling them to identify factors that contribute towards avoiding conflicts between workers and preventing them from leading to situations of harassment or discrimination, as well as to familiarize them with their responsibilities. The procedure is developed based on the following guarantees:

- **Respect and protection of individuals:** All employees have the right to a work environment, free of hostile or intimidating behavior towards them. They also have the right to a work environment that guarantees their dignity as well as their physical and moral integrity. Actions must be carried out with the utmost caution, and with respect for all individuals involved. Individuals, under no circumstance, may receive unfavorable treatment. As a matter of priority, appropriate measures to guarantee the right to health protection of the workers affected must be adopted.
- **Preventive nature:** This procedure, which applies to all employees of the company, is developed for all areas and hierarchical levels of the center, and has been developed based on the following principles:
 - Achieve maximum efficiency in Occupational Health and Safety in order to eliminate, minimize, and control occupational hazards.
 - Comply with the provisions of: The Legal Order in force in matters of risk prevention, especially in the Occupational Risk Prevention Law (Law 31/1995 and subsequent amendments to Law 54/2003), the Regulatory Standards derived from the ORP Law, and in the Prevention Services Regulations.
- **Confidentiality of data:** Those involved in the procedure must keep strict confidentiality and may not transmit or disclose information regarding the content of complaints filed, or cases currently under investigation. The information generated and provided by the proceedings while applying this protocol will be confidential, and only accessible to personnel directly involved in its processing.
- **Criteria to take into account during the investigation process:** Facts should be investigated, not opinions. Prejudgments should be avoided. The treatment of the plaintiff, defendant, and witnesses should be as delicate as possible, considering that their psychological state may be compromised. All witnesses or individuals whose testimony is requested for this process must be previously informed of the matter for which they are being requested to cooperate with, as well as their voluntary and confidential obligations. An impartial hearing and fair treatment shall be guaranteed for all affected individuals, seeking the truth and the clarification of the facts denounced, in good faith.
- **Diligence:** The investigation and resolution of the reported conduct must be carried out without undue delay, ensuring the procedure is completed in the shortest possible time while respecting due diligence.

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

- **Communication to the parties involved of the documentation generated:** When a person submits a complaint regarding conflict resolution or sexual or gender-based harassment, the reporter and the individual reported have the right to be informed of all relevant material used in relation to the outcome of the process, i.e. all documents and information kept or generated by the center, and by the persons directly involved in the complaint, while also protecting the confidentiality of sensitive information: medical data, etc.
- **Prohibition of retaliation.** Retaliation against individuals who make a complaint, appear as witnesses, or participate in an investigation of labor disputes, provided they act in good faith, should be expressly prohibited.

8.11 COMPLAINT PROCEDURE

All personnel included in this protocol shall respect the dignity of persons by avoiding conduct constituting violence in the workplace.

Any employee, or person linked to the company included in the application of this protocol, who are considered a victim of LGTBIQ+phobia at work –or any other person who has knowledge that these situations of harassment are occurring– may file a complaint with the Intermediation Team. The Intermediation Team will be the competent body for the management of this type of cases. To begin this process, send an e-mail to preventandreport@bcbl.eu, or use the complaints channel at www.bcbl.eu.

Once the complaint has been received, the Intermediation Team will meet within a **maximum of 3 working days** to assess the source, nature, and seriousness of the complaint, as well as to determine the procedure to follow.

Complaints are handled in two ways:

- **Informal Procedure:** In the event that the reported act is classified as minor.
- **Formal Procedure:** In the event that the person filing the complaint is not satisfied with the solution reached using the informal procedure (either because they consider the solution offered to be inadequate or because repeated conduct has been reported), or when the facts reported are classified as serious or very serious.

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

INFORMAL PROCEDURE FOR CONFLICT RESOLUTION

When the actions are **classified as minor**, the Intermediation Team will rapidly initiate the procedure for the analysis of the facts and the complaint. To carry out this procedure, the team may access any part of the organization at any time, and collect statements from anyone it deems necessary.

Once indications of the veracity of the complaint have been established, **the reported person will be contacted confidentially**. This contact may be made individually, or with the person who has filed the complaint (at the discretion of the individual filing the complaint). At this meeting, the reported person will be informed of the complaint regarding his or her conduct. They also will be notified of the disciplinary responsibilities they may face, if the facts are confirmed and or the behavior is repeated. The reported individual may give explanations as to justify their actions.

After procedure has been initiated, the **Intermediation Team will appoint** two members in charge of the investigation of the file (the **Designated Intermediaries**), who will be the only individuals with whom the victim will communicate with, if the victim agrees.

The role of the Intermediation Team, in this case, is limited to transmitting the complaint and informing the person reported of their disciplinary responsibilities.

The objective of this informal plan is to resolve the problem unofficially as, on occasion, showing the individual the offensive and intimidating consequences of their behavior may be sufficient to resolve the issue.

The time limit for carrying out the procedure is **7 working days**; in exceptional cases of compelling need, it may be extended by an additional 3 days.

The Intermediation Team must rely on the credibility of the individual filing the complaint. It must also protect the confidentiality of the procedure, and the dignity of the persons concerned (e.g., by assigning numerical codes to the parties).

It is necessary to evaluate the consistency of the complaint, determining whether or not the objective of the informal process has been achieved and, if so, suggest appropriate actions. This includes the opening of a formal process.

Regarding the result/resolution of the procedure, the Intermediation Team will immediately forward the outcome of the informal procedure to Management and the Equality Committee.

	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

INTERMEDIATION TEAM: The BCBL Intermediation Team will be composed of two HR workers and two people from the Equality Committee/HRS4R WG. Their identity will always be updated on the BCBL Wiki.

EQUALITY COMMITTEE/HRS4R WG: The BCBL's Equality Committee is the personal and professional development team, named the 'HRS4R WG'. Its identity and composition will always be updated on the BCBL Wiki.

FORMAL PROCEDURE FOR COMPLAINTS REGARDING DISPUTE RESOLUTION

Initiation of the process: complaint, pre-assessment and precautionary measures

In situations where the reported facts constitute **serious** or **very serious** harassment, or when the **person filing the complaint is not satisfied with the proposed solution of the informal procedure** for any reason (e.g., because the solution is considered inadequate, or due to repeated behavior, or if those filed the complaint do not agree to pursuing the informal solution procedure), the victim may file a formal complaint to clarify the possible disciplinary responsibilities of the reported individual. This is done without prejudice to the right to complain to the labor Inspection, nor through civil, labor, or criminal channels.

The complaint must be submitted using the model in **ANNEX II** and sent in writing via email to the Intermediation Team, or by using the complaints channel at to be assessed in terms of its nature and severity. If there is sufficient evidence, action will be taken 'ex officio', and investigation into the reported situation will commence.

Similar to the informal procedure, the Intermediation Team must begin investigations by trusting the credibility of the complainant, protecting the confidentiality of the procedure and the dignity of the parties involved. To do this, at the start of the procedure, numerical codes are assigned to those affected. Additionally, any person who is aware of any act of harassment can report these situations.

Once received, the complaint will **be confidentially communicated to the BCBL Management** so that appropriate precautionary measures can be taken. One precautionary measure is the immediate removal of active and passive subjects of harassment, which prevents

	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

further harm to the integrity and health of the victim. Under no circumstances may these measures cause the victim harm or impair their working conditions, nor should they substantially modify them. The Equality Group will also be informed of the details of the complaint and the actions that have been carried out to date, as well as assessment of the complaint's credibility.

Procedure

The Intermediation Team will name two people in charge of investigating the file as Designated Intermediaries, who will be the ones with whom the victim, if they so wish, will communicate only after the procedure has begun.

In order to confirm the veracity of the complaint—while respecting the fundamental rights of the people involved, in particular, the right to privacy and dignity of both parties—the case must be investigated through individual interviews with individuals and third parties involved, provided that their prior consent is obtained and that they can provide information in this regard. Given prior consent, a joint meeting may be called.

The filing of the complaint should be **communicated to the denounced respondent** as soon as possible. The respondent also has the right to a hearing, in the presence or absence of the victim (at the victim's discretion). Both parties may request the presence of one or more members of the representative bodies or, if deemed appropriate, other employees to gather evidence.

Efforts should be made to gather all the information in a single statement from the victim (unless subsequent interviews are essential for the resolution of the case), ensuring confidentiality and speed in the process.

VICTIM PROTECTION

If necessary, precautionary measures deemed appropriate to protect the victim physically and psychologically throughout the process will be assessed. For example, Physical separation, redistribution of tasks, substitution of supervisor.

CONCLUSIONS OF THE REPRIMAND PROCESS

The Intermediation Team will prepare and approve a report on the alleged harassment within a maximum of 10 days from the filing of the complaint. This report contains proof of the

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

harassment, the possible aggravating and/or mitigating circumstances and, if there are signs of veracity, the conclusions, the aggravating or mitigating circumstances, and, if applicable, the appropriate disciplinary measures to be proposed. This report will be sent immediately to BCBL Management and the Equality Group. For exceptional or urgent cases, the term may be extended by 3 additional days.

It will be guaranteed that there will be no retaliation against persons who report, testify, assist in or participate in harassment investigations, or against persons who oppose or criticize this type of conduct, either on themselves or before third parties. The adoption of measures that involve unfavorable treatment of any of the aforementioned individuals (complainants, witnesses or collaborators) will be sanctioned according to the disciplinary regime regulated below.

Complaints, denunciations or statements that are proven to be intentionally fraudulent and malicious, made only to cause unjustified harm to the accused, shall be sanctioned without prejudice to any other actions that may legally correspond.

If the victim has suffered any retaliation or reprisals during the harassment, they will be restored to their previous conditions.

As a deterrent, the result of the investigation and the sanctioning file will be shared in the area where the action has been carried out.

Finally, it will be **up to the Management to decide**, within 3 working days of receiving the report from the Intermediation Team, what measures to adopt within the scope of its competences, **while ensuring that all these actions are carried out** within the established period of 20 working days. Management will also communicate the outcome in writing to all parties involved.

In addition, Management **must inform the Equality Committee** about the existence of the case and its resolution. In these communications, in order to guarantee confidentiality, no personal data will be provided and codes assigned to each of the parties involved in the file will be used.

If the General Management does not gather the necessary evidence for the complaint to be considered well-founded, the person who filed the complaint will not be forced to work against their will with the reported individual. The company's management is obliged to facilitate the relocation of the complainant's workspace.

	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

The use of this procedure will not prevent the victim from seeking recourse through the labor inspectorate or courts via the appropriate legal processes.

VISUAL SUMMARY OF THE PROCESS

Phase	Action	Responsible	Maximum Term
Process initiation	Filing a complaint with the Intermediation Team	Person affected or witness	-
Start of Evaluation	Review of the complaint and determination of the procedure (informal or formal)	Intermediation Team	3 Working days
Informal procedure (if applicable)	Contact with the denounced party. Dialogue and warnings	Intermediation Team: Designated Intermediaries	7 Working days (extendable by 3 days)
Closing of the informal process	Case file, if resolved	Intermediation Team	immediately
Escalation to formal Process	If not resolved, or there is recurrence of the action, formal proceedings commence	Intermediation Team	-
Investigation	Interviews with implicated parties and evidence collection.	Intermediation Team: Designated Intermediaries.	10 Working Days (extendable by 3 days)
Preparation of report	Conclusions and recommendations	Intermediation Team	10 Working days
Final Decision	Evaluation of the report and determination of disciplinary measures	Management	3 Working Days
Notification and closure	Communication of the resolution to involved parties	Management	Immediately following decision
Guarantee of no retaliation	Protection of the complainant and witnesses	Management & Equality Committee	Permanent

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	<h2 style="text-align: center;">PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	Fecha: Ed.1: MAY 2025 Revisión:
---	---	---

8.12 SANCTIONING REGIME FOR LGTBIQ+ ACTIONS

There are varying degrees of LGBTIphobia, from low intensity, such as an attitude of indifference or denial of LGTBIQ+ people, to high aggressiveness, which manifests itself in physical and verbal violence. **Any conduct of this type is strictly forbidden in BCBL.**

MINOR misconduct:

- Denial of, or indifference towards, LGBTQI+ individuals.
- Derogatory comments or ridicule of values considered feminine or masculine; general sexist comments based upon gender bias.
- Using sexist or LGBTQI+phobic humor.
- Refusal to refer to a transgender person by their name according to their sexual identity or deliberate use of articles/pronouns that do not correspond to the gender with which the person identifies (with exceptions granted due to unawareness, or general inexperience)

SERIOUS misconduct:

- Jokes or ridicule of a person because of their sexual or gender orientation; any LGBTQI+phobic behavior.
- Derogatory comments and jokes about transgender people because of their transsexuality whether or not they are present in the conversation.
- Refusal to refer to a transgender person by the name established in accordance with their sexual identity or deliberate use of articles or pronouns that do not correspond to their gender identification (even when explicitly knowing the other person's preference)
- Insults related to a person's sexual orientation, gender identity or expression, or sexual characteristics and family dynamic.
- The use of company media to disseminate malicious information related to sexual orientation, gender identity, gender expression or sexual characteristics of employees.
- Ignoring, harassing, excluding or isolating people belonging to the LGBTQI+ collective.
- Display of photos, messages or other writings that have the purpose of undermining the dignity of LGBTQI+ persons.
- Revealing a person's sexual orientation or gender identity without their consent.

VERY SERIOUS misconduct:

- Preventing facility access to workers due to their identification with LGBTQI+ groups.
- Sexual violence against people for belonging to the LGBTQI+ group.

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

- Physical aggressions with the purpose of harming people because of their sexual orientation, gender identity and/or expression, sexual characteristics and/or family dynamic or association with LGBTQI+ collective.

8.13 FOLLOW-UP

The negotiating and monitoring committee will be responsible for monitoring the evolution of conflicts related to LGBTQI+phobic harassment in the company, analyzing its causes, ensuring the proper functioning of the protocol, and offering suggestions if necessary.

8.14 EXCEPTIONS

Physical and/or psychological violence, harassment, and specifically sexual harassment and harassment based on sex are defined in the Penal Code, and there are corresponding regulations that address and sanction LGBTQIphobic conduct. In the event that an administrative or judicial proceeding is initiated regarding the same case, the internal procedure will be suspended.

This procedure will be referred to an external “conflict resolution” process in the following circumstances:

- If management is involved in the conflict.
- The procedure may be discontinued by the mediation team when there is an issue that far exceeds its purpose and scope. In this case, the case will be referred to a company specialized in the matter.

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

9. GLOSSARY

LGBTI: A community that includes Lesbians, Gays, Bisexual, Transgender, and Intersex individuals (BOE)

LGBTQI+: A community composed of Lesbians, Gays, Transgender, Transsexual, Bisexual, Intersex, and Queer individuals, as well as other identities and orientations included in the '+'. The '+' symbolizes the inclusivity and continuous growth / evolution of the community.

SEXUAL IDENTITY: An individual's internal and personal experience of sex, as they perceive and self-define it, which may or may not align with their assigned sex at birth. (BOE)

GENDER: A social construct defining what it means to be a man or a woman in society, including aspects such as behavior, social roles, and clothing which can vary depending on culture and historical context. It specifically refers to the existence of two genders—male and female—without acknowledging other identities.

GENDER EXPRESSION: The way in which each person manifests their sexual identity. (BOE). It refers to external characteristics a person uses to express their gender, adhering to normative or non-normative conventions, and is independent of sexual orientation.

- **Normative gender expression:** In accordance with the individual's gender identity.
- **Non-normative gender expression:** Does not align sufficiently with the individual's gender identity. For example, a man exhibiting gestures considered feminine (whether homosexual or not).

GENDER IDENTITY: An individual and internal experience of gender as each person feels, and self-determines it, which may or may not align with their assigned sex at birth.

- **Gender Binary:** The classification of sex and gender into two distinct and complementary forms of male and female. In this binary model, sex and gender are assumed to align by default. For example, a man would be assumed to be masculine, and a woman to be feminine in appearance, body, character, and behavior.
- **Gender non-binary:** Individuals whose gender identities do not align with the male and female genders. They may identify within the broad spectrum of gender that best fits their personality. They may or may not perceive themselves as belonging fully or partially to a specific gender, or they may experience some divergence that allows them to adopt characteristics from different genders to fulfill their identity.

- **Trans person:** An individual whose gender identity does not align with their assigned sex at birth. (BOE). This identity does not depend on sexual orientation, or whether or not the person has decided to undergo a full or partial sex reassignment process. The term transgender includes, but is not limited to, transsexual individuals, who have started hormonal or surgical treatment to change their sex.
- **Transition:** The period during which a transgender person begins to live according to the gender with which they identify. This transition may or may not involve changing their name, undergoing hormonal or surgical treatments, or modifying official documents to reflect their desired gender expression.
- **Cis or Cisgender:** The counterpart to trans, meaning an individual who identifies with their assigned sex/gender.
- **Intersex:** Individuals born with biological, anatomical, or physiological characteristics, sexual anatomy, reproductive organs, or chromosomal patterns that do not align with the socially established notions of male or female bodies. (BOE)

SEXUAL ORIENTATION: Physical, sexual, or emotional attraction to a person. (BOE)

- **Monosexual orientations - Monosexuality:** A term that encompasses all sexual orientations in which a person is sexually and/or affectively attracted to only one gender.
 - **Heterosexual:** Attraction exclusively to people of the opposite sex. (BOE)
 - **Homosexual:** Attraction exclusively to people of the same sex. (BOE)
 - **Gay:** Homosexual men. (BOE)
 - **Lesbian:** Homosexual women. (BOE)
- **Plurisexual or Multisexual Orientations:** A term that encompasses sexual orientations that define attraction to more than one gender or sex.
 - **Bisexual:** Attraction to individuals of different sexes, not necessarily in the same way, or with the same intensity.
 - **Pansexual:** Attraction to others regardless of their sex or gender identity. The distinction from bisexuality lies in that bisexual people feel attraction to both female and male genders, whereas pansexual people do not consider gender identity as a factor in attraction.
 - **Polysexuality:** Romantic, sexual attraction, or sexual behavior directed toward more than one gender, but not necessarily toward all of them in the same way or with varying intensity. The difference between

 <p>BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE</p>	<h2>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h2>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	---	---

pansexuality and polysexuality lies in that pansexuality encompasses attraction regardless of gender, while polysexuality is directed toward a specific, variable group of genders. In other words, both sexualities share plural attraction to gender, but polysexuality is directed only toward some genders, while pansexuality includes all or is independent of gender.

Sometimes plurisexuality may also encompass the following terms:

- **Heteroflexibility:** sexual orientation or situational sexual behavior that is characterized by primarily heterosexual activity with some limited homoerotic orientation that is considered distinct from bisexuality.
- **Homoflexibility:** Sexual orientation or situational sexual behavior characterized by primarily homosexual activity with some limited heteroerotic orientation that is considered distinct from bisexuality.
- **Ceterosexuality (previously called Skoliosexuality):** Sexual orientation characterized by sexual or romantic attraction to trans or non-cisgender, i.e., non-binary, or genderfluid, persons.
- **Asexuality:** the lack of sexual attraction to others, or low or no interest in or desire for sexual activity.

ROMANTIC ORIENTATION - ROMANTIC IDENTITIES: Classification of the gender a person experiences romantic attraction towards; or is most likely to fall in love with.

- **Aromantic:** People who experience little or no romantic attraction. However, they may experience sexual attraction and may have any type of sexual orientation.
- **Heteroromantic:** Romantic attraction to people of a gender other than one's own.
- **Homoromantic:** Romantic attraction to people of the same gender.
- **Biromantic:** Romantic attraction to people of two or more genders.
- **Panromantic:** Romantic attraction to people regardless of their gender.
- **Multiromantic or pluri-romantic:** Person who experiences romantic attraction to two or more genders (does not have to be linked to multisexuality).

FAMILY DIVERSITY: A variety of families that include members who are lesbian, gay, bisexual, or transgender; single-parent families, adoptive families, multiethnic and multiracial families, families started later in life, transnational families, childless families, blended families, or any other family dynamic.

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE	Fecha: Ed.1: MAY 2025 Revisión:
---	---	---

OTHER DEFINITIONS:

- **ASEXUAL:** A person who feels a lack of sexual attraction to other people, or a low or no desire for sexual activity.
- **Q or QUEER** A term that goes beyond traditional labels of sexual orientation and gender identity, identifying with neither binary. For example, a person may be fluid and move between both extremes of the gender/sexual orientation spectrum.
- **DEMISEXUAL:** A person who feels attraction to another person only after forming a bond with them. That is, they lack what is known as primary sexual attraction, which is based on attraction at first sight.
- **SAPIOSEXUAL:** A person who feels attraction to another based on their intelligence. This attraction is rooted in an intellectual connection.
- **“+”:** People that do not fall under any of the previous definitions.

10.- RELEVANT CONTACT INFORMATION

VAS: Victim Assistance Service (VAS for psychological support)

Tlf: 900 180 414; 900 100 928; 900 400 028

IMQ: Prevention service

Tfno: 943 505 000

E-mail: idoia.subinas@imgprevencion.es

SEHASKA: LGBTI Basque Country Families Association

www.sehaska.org

GEHITU: Gay, Lesbian, Trans, Bisexual and Intersex association of the Basque Country

c/ Zabaleta 47

20.002 Donostia (Gipuzkoa)

Tel: 607.82.98.07

	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

ANITZAK: Association for LGTBIQ+ rights of Bizkaia

www.anitzak.com

Tlf: 636.692.040

NAIZEN: Association of Families of Transsexual Children Basque Country

www.naizen.eus

LINEA ARCOIRIS: Reference consultation service for the Spanish LGTBI community.

www.felgtbi.org

SAPT: Osakidetza's Primary Health Care Service for Trans People

Contact: General Practitioner assigned in Osakidetza (Basque Country Public Health System)

Ministry of Equality telephone number 028:

The Ministry of Equality of the Government of Spain has established the telephone number 028, a free and confidential service available 24- hours a day, 365 days a year. It offers information, legal advice and specialized psychosocial care for LGBTQI+ people and their relatives, especially in cases of violence due to LGBTIphobia.

Tel: 028

FAMS (Federation of Associations of Single Mothers)

www.familiasmonoparentales.es

Tlf:633.23.12.64

MAITEA: Support Network for Single-Parent Families in the Basque Country

www.maitea.eus

ASFAMOGI: Association of Single-Parent Families of Gipuzkoa

www.axesor.es

Tlf: 943.291.825

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	<p>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</p>	<p>Fecha: Ed.1: MAY 2025</p> <p>Revisión:</p>
---	--	---

11.- ANNEXES

ANNEX I: TEMPLATE FOR REPORTING LGBTQI+PHOBIA

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	<h1>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h1>	Fecha: Ed.1: MAY 2025 Revisión:
---	---	---



BASQUE CENTER
ON COGNITION, BRAIN
AND LANGUAGE

(ES) *Procedimiento Prevención y Gestión de Violencia en el trabajo*
 Nombre del documento: RGD

Responsable	Miramón	Documento Número	3.1.10	Edición	1	Fecha última actualización	ABRIL 2025
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PROCEDURE FOR THE PREVENTION AND MANAGEMENT OF VIOLENCE IN THE WORKPLACE

ANNEX II: COMPLAINT TEMPLATE

REQUESTER:

☐ Affected person ☐ HR management ☐ Other

TYPE OF HARASSMENT:

☐ Sexual ☐ Other type

AFFECTED PERSON'S INFO:

Name & Surname	
ID/PASSPORT NUMBER	
Work relationship/type of contract	
Tel. number and e-mail	

DESCRIPTION OF EVENTS:

In case of witness(es), please specify name(s) and surname(s):

☐ I request to initiate the protocol of action for harassment or discrimination in the workplace.

DATE AND PLACE

SIGNATURE

AUTHORIZATION FOR THE PROCESSING OF PERSONAL DATA

We inform you that your personal data, or the data of the person you represent, will be processed and incorporated into files owned by the BCBL, for their use in the management and administration of the center and in studies on cognition, brain and language, as well as for sending information on the previous purposes by any means. The consent of the person concerned will legitimize the processing of data. These data will be kept indefinitely and may be granted, anonymously, to institutions or individuals with similar purposes, except for the legally established provisions.

We inform you that you have the right to access, amend, delete or port your data, limit their processing, revoke your consent or not to be subject to decisions based on automated processing, in accordance with the (EU) 2016/679 Regulation and the Organic Act 3/2018 of December 5 on the Protection of Personal Data and Guarantee of Digital Rights by sending an e-mail to info@bcbl.eu or by writing to the Personal Data Processing Representative to the following address, Paseo Mikeletegi, 69 - 2º - 20009 SAN SEBASTIAN, enclosing a copy of your ID.

BCBL, Basque Center on Cognition, Brain and Language
 IFK/NIF G20988929
 Inscrita en el registro de Asociaciones con Nº AS/G/14254/2009
 Web: www.bcbl.eu Teléfono: 943309300 Fax: 943309052 Mail: info@bcbl.eu

 BASQUE CENTER ON COGNITION, BRAIN AND LANGUAGE	<h1>PLAN FOR REAL AND EFFECTIVE EQUALITY OF LGBTQI+ PEOPLE</h1>	Fecha: Ed.1: MAY 2025 Revisión:
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RGPD
Nombre del documento:

(EN) Procedimiento de prevención y gestión de violencia en el trabajo

Responsable	Miramón	Documento Número	3.1.10	Edición	4	Fecha última actualización	ABRIL 2025
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PROCEDIMIENTO DE PREVENCIÓN Y GESTIÓN DE VIOLENCIA EN EL TRABAJO

ANEXO II: PLANTILLA DE DENUNCIA

SOLICITANTE:

☐ Persona afectada
 ☐ Gestión de personal
 ☐ Otro

TIPO DE ACOSO:

☐ Acoso sexual
 ☐ Acoso de otro tipo

DATOS DE LA PERSONA AFECTADA:

Nombre y apellido(s)	
Número DNI/PASAPORTE	
Relación laboral/tipo de contrato	
Núm. Teléfono e email	

DESCRIPCIÓN DE LOS HECHOS:

En caso de haber testigo(s), por favor indicar nombre(s) y apellido(s):

.....

☐ Solicito iniciar el protocolo de acción en caso de acoso o discriminación en el lugar de trabajo.

LUGAR Y FECHA

FIRMA

AUTORIZACIÓN PARA EL TRATAMIENTO DE LOS DATOS DE CARÁCTER PERSONAL

Sus datos de carácter personal, o de la persona a la que representa, serán tratados y se incorporarán a ficheros de los que es responsable el BCBL y que tienen como finalidad la gestión y la administración del centro, la realización de estudios sobre la cognición, el cerebro y el lenguaje y el envío de comunicaciones relacionadas con estos fines por cualquier medio. La legitimación para el tratamiento es el consentimiento de la persona interesada. Estos datos, que se conservarán de forma indefinida, solo podrán ser cedidos, anonimizados, a instituciones o personas dedicadas a fines análogos, salvo las cesiones legalmente establecidas.

Podrá ejercitar los derechos de acceso, rectificación, supresión, portabilidad, limitación de tratamiento, revocar el consentimiento o no ser objeto de decisiones basadas únicamente en el tratamiento automatizado de sus datos, de conformidad al Reglamento (UE) 2016/679 y a la ley Orgánica 3/2018 de 5 de diciembre de protección de datos personales y garantía de los derechos digitales dirigiendo un correo electrónico a info@bcbl.es o bien mediante escrito dirigido al Delegado de Protección de Datos a la dirección Paseo ~~Unicaja~~ 69 – 2º - 20009 SAN SEBASTIÁN, acompañando fotocopia de su DNI.