

EUROPEAN BUSINESS INSTITUTE

Wiltz, Luxembourg

Gender Equality Plan

2025–2027

Adopted by EBU Senior Management · September 2026

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Signed and adopted by:

President and Academic Dean · Dr James Mulli Date: 23rd September 2026

Administration Director (Board Member) · Kübra Erden Date: 23rd September 2026

1. Executive Summary

This Gender Equality Plan (GEP) sets out the European Business Institute's (EBU's) commitment to embedding gender equality across all dimensions of its institutional life, from the composition of its workforce and leadership to the content of its curricula and the culture of its campus. It covers the period 2025–2027 and was formally adopted by senior management in September 2026.

EBU is a private, non-profit higher education institution based in Wiltz, Luxembourg. It serves a diverse, predominantly non-Luxembourgish adult learner community of over 2,000 active students via its Moodle LMS, with programmes spanning AI, data science, cybersecurity, business, and digital skills. EBU is already majority women-staffed and runs a dedicated women's leadership programme for learners. This GEP formalises, deepens, and makes measurable EBU's existing commitment to gender equality, bringing it in line with European standards for higher education institutions.

The GEP addresses five thematic areas: work-life balance and organisational culture; gender balance in leadership and decision-making; gender equality in recruitment and career progression; gender dimension in teaching and learning content; and prevention of gender-based violence. For each area it establishes a baseline, sets measurable targets, and commits to biennial data reporting.

Cross-cutting measures within these areas address: learner-side flexibility and caring-responsibilities support; gender identity inclusion for non-binary, gender-diverse, and trans staff and learners (including expanded data collection options and inclusive language); gender-balanced and inclusive institutional communications and

marketing; and mandatory unconscious bias training for Board members, senior leadership, and recruitment panels.

2. Institutional Context

The European Business Institute (EBU), is a non-profit, private higher education institution recognised by the Luxembourg Ministry of Education. Founded to deliver internationally accessible, professionally oriented education to adult learners in Luxembourg and the Greater Region, EBU offers bachelor's and master's scholarship programmes as well as continuing-education certificates in AI, data science, cybersecurity, blockchain, fintech, quantum computing, robotics, and digital business.

EBU's Moodle LMS platform currently serves over 2,000 active registered learners and is maintained to Web Content Accessibility Guidelines 2.1 AA accessibility standards by a dedicated technology team. The institution's annual operating budget is approximately €300,000. EBU holds a Trustpilot rating of 4.5 out of 5, reflecting strong learner satisfaction across its online programmes. EBU's student body is predominantly non-Luxembourgish, multilingual, and professionally active, making it a natural home for continuing skills and rights-literacy education. [EBU has welcomed 330 women from Kabul](#), Afghanistan to its online courses, demonstrating its practical commitment to supporting women from conflict-affected and access-restricted contexts regardless of geographic or political circumstance.

EBU is committed to providing education that is inclusive, equitable, and responsive to the needs of underrepresented groups. This is expressed through Certificate courses dedicated to women learners (see 4.3), as well as learners with disabilities, and through accessible, online-first delivery that removes geographic and physical barriers.

2.1 Scope of This GEP

This GEP covers EBU's entire institutional operations including: relevant academic programmes and curricula; all staff (academic, administrative, and technical); governance and leadership; student services; and outward-facing activities including partnerships and dissemination. It has been developed through a participatory process involving all staff and key student representatives.

3. Governance and Resources

3.1 Responsibility and Oversight

Senior management responsibility for this GEP rests with the Administration Director, who also serves as a Board Member. Day-to-day coordination is delegated to a Gender Equality Lead drawn from the administrative team, with support from the Programme Director. The GEP has a dedicated review conducted annually and a full evaluation conducted every two years.

Role	Responsible Person	Responsibilities
Administration Director / Board Member	Kübra Erden	Overall GEP ownership, Board reporting, policy sign-off

Gender Equality Lead (designated)	Kubra Erden	Day-to-day coordination, data collection, monitoring reports
Programme Director	Ann Matati	Curriculum gender mainstreaming, staff training oversight
GEP Review Committee	All staff (annual meeting)	Annual review, target-setting, action planning

3.2 Notable Board Members

EBU's Board includes individuals with distinguished public careers who strengthen the institution's commitment to gender equality and international engagement. [Helen Chilisa](#) serves as Chairperson of the Board ; she is a management executive with leadership experience across public, private, and NGO sectors in Botswana, Canada, and internationally. Her career spans educational reform (World Bank, UNICEF), corporate strategy (Commercial Director at Air Botswana; Country Manager at ACCA), and institutional development. She holds advanced degrees in international marketing, diplomacy, and aerospace management and is completing a Doctorate in Business Administration. She is a board member and advocate for women's empowerment and inclusive education. [Monica Semedo](#), a former Member of the European Parliament (MEP) representing Luxembourg, serves as a Board Member. Her parliamentary experience spanning European policy, multilateralism, and social inclusion brings direct expertise in EU gender equality frameworks to EBU's governance.

3.3 Resources

EBU commits the following dedicated resources to the implementation and monitoring of this GEP:

- At least 0.1 FTE of staff time per year allocated to Gender Equality Lead coordination responsibilities
- An annual GEP implementation budget of no less than €2,000 covering training, data collection, and reporting activities
- Access to external expertise in gender equality and higher education as needed
- Biennial external review of GEP implementation progress

4. Gender Equality Audit: Baseline Findings (2024–2025)

EBU conducted a gender equality audit in 2024–2025 covering all five thematic areas mandated by the European Commission for institutional GEPs. The audit examined workforce composition, governance structures, recruitment and career processes, curriculum content, and the institutional environment for wellbeing and safety. Key findings are summarised below.

4.1 Workforce and Leadership

Indicator	Baseline Value (2025)	Notes
% women in total staff	63.6%	Women are majority at all operational levels
% women in Executive Leadership Team	66.7%	Two of three named senior roles held by women

% women on Board of Trustees	71.4%	Majority of seats held by women (7 of 11)
% women on Board of Directors	62.5%	Majority of seats held by women

4.2 Recruitment and Career Progression

EBU’s recruitment processes are conducted online and are gender-neutral by design. Job descriptions and person specifications are reviewed for gendered language. No formal structured mentoring programme was in place at audit date; this has been identified as a gap and addressed in Section 5.

4.3 Teaching and Curriculum Content

EBU offers three gender-focused courses , “Women and Leadership”, “Cases in Gender Equality”, and “Reimagining Islamic Feminism” , each designed for women learners and led by women instructors. Courses in EBU’s STEM-adjacent portfolio (AI, data science, cybersecurity) also address, representation, and the gender dimension of digital skills. These courses combine theoretical frameworks with applied case-study methodology, with Reimagining Islamic Feminism exploring gender equality through Islamic scholarly traditions and the lived experiences of Muslim women globally. A curriculum mapping exercise across non-STEM modules to ensure consistent integration of gender perspectives is planned for the Autumn Term of Academic Year 2026–27.

4.4 Organisational Culture and Work-Life Balance

EBU operates a Results Only Work Environment (ROWE) policy, under which all staff are empowered to set their own working hours, working locations, and schedules , provided that their responsibilities and outcomes are met. This policy, which eliminates rigid presenteeism requirements entirely, is a structural commitment to equitable work-life integration that benefits staff of all genders, particularly those with primary caring responsibilities. A dedicated ROWE and wellbeing policy was formalised in 2025.

4.5 Gender-Based Violence and Harassment

At the time of audit, EBU had an informal zero-tolerance stance on harassment. The audit identified the need for a formal written policy, a clear reporting mechanism, and mandatory training. These have been addressed in the implementation phase (Section 6).

5. GEP Objectives and Measures

Based on the audit findings, EBU has established the following gender equality objectives and measures across five thematic areas. Each objective is assigned measurable targets and a lead responsible person.

Area A: Work-Life Balance and Organisational Culture

Objective A1: Ensure all EBU staff have access to flexible, family-friendly working arrangements regardless of gender or caring responsibilities, building on EBU's Results Only Work Environment (ROWE) policy.

Measure	Target	Timeline	Lead
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Maintain and develop ROWE policy (Results Only Work Environment): staff set own hours/locations based on outcome delivery , no fixed presenteeism requirement	Policy published, 100% staff aware	Completed 2025; reviewed annually	Admin Director
Formalise ROWE and wellbeing policy documentation covering all staff roles and contract types	Policy published and signed	Completed 2025	Admin Director
Conduct annual staff wellbeing survey disaggregated by gender	Response rate $\geq 70\%$	Annual from 2026	Admin team
Establish parental leave entitlements equal to Luxembourg statutory minimum for all contract types	Policy in place	Completed 2025	Admin Director
Introduce a flexible assessment deadline policy for learners with primary caring responsibilities; ensure all teaching sessions are recorded and available for asynchronous access within 48 hours; establish a dedicated support pathway for learners managing caring responsibilities alongside study	Policy in place; 100% sessions recorded	2026–2027	Programme Director
Expand all registration, enrolment, survey, and feedback forms to include gender identity options beyond binary (including non-binary, gender-diverse, and prefer not to say); review all student- and staff-facing institutional communications to adopt inclusive, gender-neutral language throughout	Forms updated; language audit complete	2026	Admin team
Conduct an annual audit of marketing, admissions, and outward-facing institutional materials to ensure gender-balanced imagery, inclusive representation of diverse genders, and gender-neutral language; update or replace non-compliant materials prior to the next admissions cycle	Annual audit; 100% materials reviewed and updated	From 2026; annual	Admin team

Area B: Gender Balance in Leadership and Decision-Making

Objective B1: Achieve and maintain gender-balanced representation in all governance and decision-making bodies.

Measure	Target	Timeline	Lead
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Maintain $\geq 40\%$ of each gender in Board of Directors	$\geq 40\%$ each gender	2025–2027	Executive Director
Gender-balanced shortlists for all leadership vacancies	100% of shortlists	From 2026	Admin Director
Annual leadership gender audit and public reporting	Report published	Annual from 2026	Gender Lead
Deliver mandatory unconscious bias awareness training to all Board members, senior leadership, and members of all recruitment and promotion panels; include practical structured decision-making guidance to mitigate bias at key decision points; refresher sessions delivered biennially	100% completion; biennial refresh	2026–2027; refreshed biennially	Gender Lead

Area C: Gender Equality in Recruitment and Career Progression

Objective C1: Ensure equitable, transparent recruitment and promotion processes free from gender bias.

Measure	Target	Timeline	Lead
Audit all job descriptions for gendered language using a checklist tool	100% compliance	Completed 2025	Admin team
Introduce structured interview scoring rubrics for all recruitment	Rubrics in use	2026	Admin Director
Establish a mentoring scheme pairing junior and senior staff	Launched as part of EBU's regular job-sharing exercises	2026–2027	Programme Director
First gender pay gap analysis and relevant action plan	Report to be published end of Q4	Q4 2026	Admin Director

Area D: Gender Dimension in Teaching and Learning Content

Objective D1: Integrate gender perspectives systematically across EBU's full curriculum portfolio, building on existing gender equality courses and women's empowerment programmes.

Measure	Target	Timeline	Lead
Complete gender curriculum mapping across all modules	100% modules mapped	Autumn Term 2026	Programme Director
Maintain and develop "Women and Leadership" course (applied leadership development for women learners; case-study methodology)	≥ 30 enrolments/year	Ongoing; updated 2026	Programme Director

Maintain and develop "Cases in Gender Equality" course (theoretical + applied gender equality frameworks for all learners)	≥30 enrolments/year	Ongoing; updated 2026	Programme Director
Maintain and develop "Reimagining Islamic Feminism" course (gender equality through Islamic scholarly traditions; experiences of Muslim women globally)	≥20 enrolments/year	Ongoing; launched 2026	Programme Director
Maintain and develop "Robotics for Rookies" course, delivered in partnership with Kenya Girl Guides Association , long-standing EBU partner; joint delivery of "Robotics for Rookies", a practical robotics and digital skills programme for young women; EBU also contributes curriculum resources and mentoring capacity	≥30 enrolments/year	Ongoing; 2025-2027	Programme Director
Ensure all AI/data modules explicitly address gender bias in data and algorithms	100% of relevant modules	2026-2027	Programme Director
Expand women's empowerment programme to include mentoring and networking component, leveraging EBU's civil society partnerships	Cohort of 30+ per year	2026-2027	Programme Director
Report annually on gender breakdown of learner enrolments and completions by programme	Annual data report	From 2026	Programme Director

Area E: Prevention of Gender-Based Violence and Harassment

Objective E1: Create a safe institutional environment free from gender-based violence, harassment, and discrimination.

Measure	Target	Timeline	Lead
Adopt and publish a formal Anti-Harassment and Dignity at Work Policy	Policy published	Completed 2026	Admin Director
Establish a confidential reporting mechanism for staff and students	Mechanism live	2026	Admin team
Deliver mandatory online training on gender-based violence prevention for all staff	100% staff completion	2026-27	Gender Lead

Annual review of reported incidents and outcomes	Review conducted	Annual from 2026	Admin Director
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6. Implementation Summary (2025–2026)

The following measures from Section 5 have been fully implemented as of the date of this GEP's adoption:

- Results Only Work Environment (ROWE) policy operational , all staff set own hours and locations based on outcome delivery (Area A)
- ROWE and wellbeing policy formalised (Area A)
- Parental leave policy documented (Area A)
- All job descriptions reviewed for gendered language (Area C)
- Gender curriculum mapping exercise completed across all modules (Area D)
- AI and data science modules updated to include gender bias content (Area D)
- Anti-harassment and Dignity at Work Policy adopted and published (Area E)
- Confidential reporting mechanism established (Area E)
- Staff training on gender-based violence prevention delivered to all current staff (Area E)

The following measures are in progress and scheduled for completion during the monitoring phase (2026–2027):

- Annual staff wellbeing survey (first issue Q4 2026)
- Gender pay gap analysis and action plan (Q4 2026)
- Structured interview rubrics roll-out (2026)
- Mentoring scheme launch (2026–2027)
- Expanded women's empowerment programme with networking component (2026–2027)
- First annual learner enrolment and completion gender data report (Q1 2027)

7. Monitoring and Evaluation Framework

EBU is currently in the monitoring and evaluation phase of its first GEP cycle. Monitoring activities are as follows:

7.1 Data Collection

EBU commits to collecting the following sex/gender-disaggregated data on a biennial basis, with the first full data report published in early 2027:

Data Set	Frequency	Source	Published?
Staff headcount by gender and grade	Annual	HR records	Yes , annual report
Board/leadership composition by gender	Annual	Governance records	Yes , annual report

Recruitment shortlists and appointments by gender	Annual	HR records	Internal
Learner enrolments and completions by programme and gender	Annual	Moodle LMS	Yes , annual report
Staff wellbeing survey results disaggregated by gender	Annual	Survey tool	Aggregated summary public
Gender pay gap	Biennial	Accounts	Yes , biennial report
Harassment/discrimination reports and outcomes	Annual	Reporting mechanism	Aggregated, anonymised
Gender identity disaggregation in staff and learner data (non-binary, gender-diverse, prefer not to say options offered in all forms)	Annual	From 2026	Admin team

7.2 Review Schedule

Review Activity	Frequency	Output	Lead
GEP progress review (all staff)	Annual	Action plan update	Gender Lead
Board GEP report	Annual	Board paper	Admin Director
Full GEP evaluation and data report	Biennial (2027)	Published evaluation report	External reviewer
GEP renewal / next cycle planning	2027	GEP 2028–2030 draft	Gender Lead + Board

7.3 Stakeholder Engagement

EBU's GEP has been developed and is monitored through active engagement with a wide range of internal and external stakeholders, including a significant network of civil society women's organisations:

- All staff - participated in the 2025 audit survey and will participate in annual wellbeing surveys; represented on the GEP Review Committee
- Board of Directors - adopted this GEP and receives annual progress reports
- Kenya Girl Guides Association - partnership supporting women's access to digital skills and leadership education; EBU contributes curriculum resources and mentoring capacity
- Women In Tech - strategic partnership focused on women's pathways into technology professions; joint programme development and learner referral network
- Senator Crystal Asige (Kenya) - distinguished Kenyan Senator and disability rights advocate; EBU partner supporting outreach to Kenyan learners and strengthening EBU's engagement with East African civil society and government networks
- Multiple additional women's civil society organisations - EBU holds 162 signed Memoranda of Understanding (MOUs) with partner organisations globally, of which approximately 80 are currently active in student referral and community engagement. Across the full signed MOU base, 30 organisations (18.5%) are explicitly women- or girls-focused, spanning technology, entrepreneurship,

energy, and advocacy. A further 19 youth and community development organisations serve populations in which women and girls are primary beneficiaries, bringing the women-inclusive share of the partnership network to approximately 30%. A full partnership register is maintained by the Partnerships Coordinator

- External expertise - biennial independent review of GEP implementation
- Luxembourg higher education network - EBU participates in national gender equality forums and will share learning from this GEP

8. Intersectionality

EBU recognises that gender inequality intersects with other axes of disadvantage. EBU's learner community is predominantly non-Luxembourgish, multilingual, and diverse in terms of national background, age, and professional experience. A significant proportion of EBU's learners are women from communities where access to higher education has historically been limited by a combination of gender and socio-economic factors. A particularly compelling example of this commitment is EBU's welcome of 330 women from Kabul, Afghanistan , one of the world's most gender-restricted environments for education , into its online programmes, providing meaningful access to internationally recognised qualifications.

EBU's programmes are specifically designed to address intersecting disadvantages, providing flexible, affordable access to technology-focused higher education for women who may face barriers related to gender, language, geography, and economic status simultaneously. EBU's courses "Women and Leadership" and "Cases in Gender Equality" are developed with an intersectional lens, explicitly examining how gender interacts with race, class, and geography. EBU's civil society partnerships , including with the Kenya Girl Guides Association and Women In Tech , extend this intersectional reach across different cultural and national contexts.

EBU also serves learners with disabilities and is committed to ensuring that gender equality measures are accessible to and inclusive of disabled students and staff. Web Content Accessibility Guidelines 2.1 AA compliance on all digital platforms reflects this commitment in practice.

EBU explicitly includes non-binary, gender-diverse, and trans staff and learners within the scope of this GEP. Gender identity inclusion is addressed through expanded data collection options in all registration and survey forms, and through the adoption of inclusive, gender-neutral language across all institutional communications (see Area A measures).

In future GEP cycles, EBU commits to expanding its intersectional data collection to capture the interaction between gender and other protected characteristics (disability, age, national origin) to enable more targeted action.

9. Formal Adoption and Publication

This Gender Equality Plan has been formally adopted by the senior management of the European Business Institute and is published on the EBU website at ebulux.lu/gender-equality-plan. It supersedes any prior informal gender equality commitments and enters into force upon the signatures below.

This document is reviewed annually by the GEP Review Committee and a full evaluation is conducted biennially. The next full evaluation is scheduled for early 2027. A revised GEP covering 2028–2030 will be prepared and adopted by the end of 2027.

Signatory	Role	Signature	Date
Dr James Mulli	President and Academic Dean, EBU		
Kübra Erden	Administration Director / Board Member		