



LNDS

LUXEMBOURG NATIONAL DATA SERVICE

Gender Equality Plan (GEP)

Guiding principles

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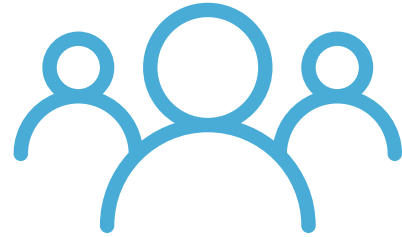
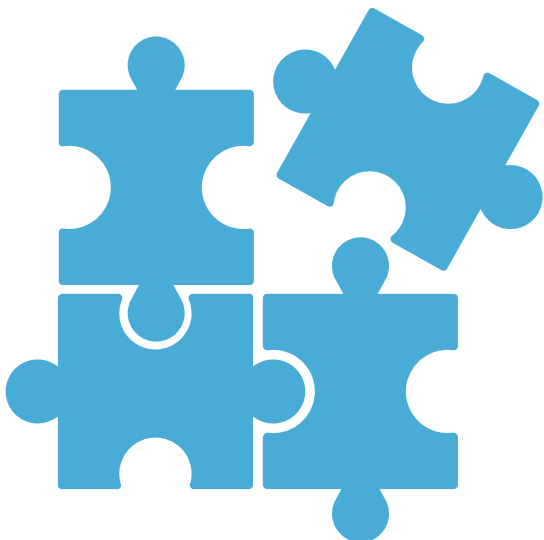
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Introduction

LNDS is committed to fostering a fair, inclusive and respectful working environment where all individuals can contribute, develop and thrive. Gender equality is approached as an integral component of good governance, sustainable people practices and organisational quality.



This commitment is anchored both at European and national level. In May 2024, LNDS signed the Diversity Charter Lëtzebuerg, thereby joining a national initiative promoting equal opportunities, inclusion and respect in the workplace. By adhering to the Charter, LNDS formally reaffirmed its commitment to embedding diversity and inclusion principles into its organisational culture and daily practices.

Building on this national engagement, the present Gender Equality Plan (GEP) sets out LNDS's guiding principles, governance framework and overarching approach to gender equality. The GEP is designed as a transparent and explanatory reference for external stakeholders, while providing a structured foundation for the development and implementation of concrete internal measures.

The GEP is conceived as a living framework: it establishes direction and accountability while allowing LNDS to adapt its actions over time in line with organisational evolution, workforce dynamics and regulatory developments.



Alignment with European and National frameworks

The LNDS Gender Equality Plan is rooted in a broader European movement to strengthen fairness, inclusion, and equal opportunity across research and innovation.

The European Commission, together with the European Research Area (ERA) and the EU Gender Equality Strategy 2025–2030, continues to set clear expectations for organisations to actively work toward eliminating gender inequality and the intersecting social and economic barriers that shape research environments.

Under Horizon Europe, gender equality is recognised as a crosscutting principle and a requirement for public institutions to access research and innovation funding, making Gender Equality Plans one of the EU’s most important instruments for driving long-term cultural change.

In line with these European ambitions—and aligned with Luxembourg’s framework on equal opportunities¹, LNDS implements its Gender Equality Plan as a concrete tool to improve organisational practices, support inclusive decision-making, and contribute to fair and equitable conditions within the research support ecosystem it serves.





Scope and Principles of Action

- **People lifecycle**
Including selection and career progression
- **People experience**
Including work-life balance, communication, work climate, organisational culture
- **Senior positions' representation and participation in decision-making**
- **Raising awareness**

Guiding principles



Fairness and equal treatment
based on objective, non-discriminatory criteria



Proportionality, taking into account the size and structure of the organisation.



Respect for diversity, recognising that individuals experience gender in different ways



Shared responsibility across leadership, employees and representative bodies.

These guiding principles are rooted in LNDS's core values, in particular trust, transparency, and a commitment to enabling people and teams to thrive. They reflect how LNDS approaches collaboration, decision-making, and responsibility in its daily operations and in its relations with employees and partners.



LNDS Approach to Gender Equality

LNDS approaches gender equality through the lens of fairness, organisational quality, and sustainable people management, rather than through quota based or prescriptive measures. The objective is to ensure equal access to opportunities, objective career progression, and equal pay for equal work or work of equal value, within a workplace culture grounded in dignity and respect.

For This Gender Equality Plan, LNDS initially applies the concept of gender equality *stricto sensu*, in line with European and national frameworks and the terminology of the European Institute for Gender Equality (EIGE). In this context, gender equality refers to ensuring equal rights, responsibilities, and opportunities for all genders, so that outcomes and treatment do not depend on how an individual was born.

At this stage, monitoring relies on gender as recorded on official identity documents, as reported to People Department upon joining the organisation. This approach ensures clarity, consistency, and legal robustness, and reflects the data currently available within LNDS.

Recognising that gender can be experienced and expressed in diverse ways, LNDS commits to approaching its GEP through a broader inclusive diversity lens. Gender identity is understood as an individual's deeply felt personal experience of gender, which may or may not correspond to sex assigned at birth. While data related to gender identity is not yet available in a consistent and voluntary manner, LNDS considers its inclusion as part of a progressive GEP journey, to be explored responsibly as internal practices and data governance evolve.





Gender Equality Plan: in practice

a. From the initial picture...

Understanding where the organisation stands today is essential to shaping meaningful progress tomorrow.

As a first step in developing LNDS's Gender Equality Plan, an initial analysis of workforce representation was carried out to establish a baseline overview of current gender dynamics. This analysis provides a working reference point that helps identify strengths, highlight areas requiring attention, and support informed prioritisation of future actions.

Beyond structural indicators, LNDS recognises that gender equality is also shaped by how employees experience inclusion and fairness in their daily working environment. In parallel with the quantitative baseline, employee perceptions related to gender equality and inclusion were therefore assessed through the organisation's employee experience survey.

The results collected between May 2025 and December 2025 show a positive progression in employee perceptions, reflecting an encouraging increase in awareness and confidence in LNDS's approach. The employee experience survey is conducted on a bi-yearly basis and will continue to evolve in line with the objectives and scope of the GEP.

Monitoring activities are conducted using aggregated and proportionate data, in line with data protection principles. For reasons of confidentiality and relevance, LNDS does not publish detailed demographic statistics. Insights derived from internal monitoring are instead used to guide governance discussions, inform the internal GEP Action Plan, and support continuous improvement over time.





b. ... to living 'GEP Action plan' with governance principles

At LNDS, the Gender Equality Plan (GEP) is designed as a living, adaptable and pragmatic framework that evolves in line with the organisation's needs and available resources.

Its measures are defined, prioritised, and updated through the internal GEP Action plan (Annex 1), which guides both annual planning and reporting.

The GEP Guiding Principles are validated by the CEO together with the leadership team of LNDS; the Diversity Council (DC) is responsible for bringing them into practice by conducting regular gender audits that monitor among other diversity thematics, the state of gender (in)equality within LNDS.

The DC reports annually to the CEO and to the Board of Directors, ensuring leadership oversight, accountability, and continuity.

The DC is composed of:

One Leadership Team member (can be rotating) plays an active role within the Diversity Council, contributing strategic perspective, championing cross functional alignment, and supporting decisionmaking at the highest level, role modelling a culture of diversity.

One People Department representative (can be rotating) plays a key role in providing and improving the diversity of analytics, advising, embedding the measures into people's processes and organisational routines and championing a culture of diversity.

As mandated under Luxembourg labour law, the Delegate for Equity serves within the Diversity Council as the formal employee representative

for gender equality, relaying concerns, proposing measures, and safeguarding equal treatment in areas such as access to employment, training, promotion, remuneration, and working conditions.

To ensure agility and access to the right expertise, each DC meeting may be joined by up to two additional contributors selected based on the relevance of their expertise to the topics under discussion. These contributors may include special guests, subject-matter experts, or internal reporters whose input can enrich conversations around priority setting, monitoring implementation status, assessing progress, and interpreting the results of regular employee experience surveys.

The DC must be, in any case, gender balanced and as diverse as possible.

The GEP Action plan success depends on three essential conditions:

- the measures genuinely address LNDS's organisational needs;
- they are executed according to the yearly agenda and cadence defined by the DC;
- Gender/diversity audits show sustained improvement over time and enable transparency around the rationale.

Through shared responsibility and openness to additional contributors, LNDS ensures that the GEP moves beyond intention and evolves into meaningful, measurable and context-appropriate action.



Annex reference

Annex 1 – Internal GEP Action Plan: Structure and Planning Template

This annex provides an overview of the structure and planning logic of the LNDS Internal Gender Equality Plan (GEP) Action Plan. It is included for transparency purposes and illustrates how the principles set out in the LNDS Gender Equality Plan Guidelines are translated into concrete internal actions.

The detailed content of the Action Plan, including specific measures, timelines, owners and supporting data, is maintained as a separate internal working document and is not publicly disclosed.

[See Annex](#)

Footnotes



1:

1. Constitutional Basis

Article 11(2) of the Luxembourg Constitution:

“Women and men are equal in rights and duties. The State ensures that it actively promotes the removal of any obstacles to equality between women and men.”

This establishes gender equality as a fundamental principle of law. [eige.europa.eu], [chartediversite.lu]

2. Labor Code Provisions

Equal Pay (Law of 15 December 2016):

Employers must ensure equal pay for equal work or work of equal value. Any pay difference must be based on objective, non-discriminatory criteria. [itm.public.lu]

Anti-Discrimination (Law of 28 November 2006):

Transposes EU Directives 2000/43/EC and 2000/78/EC into national law. Prohibits direct and indirect discrimination in employment based on:

Gender (including pregnancy and maternity)

Religion or beliefs

Disability

Age

Sexual orientation

Race or ethnic origin

Nationality

These provisions are codified in Articles L.225-1, L.241-1, and L.251-1 of the Labour Code. [csl.lu], [chartediversite.lu]

3. Work-Life Balance & Family Leave

Transposition of EU Directive 2019/1158 (Work-Life Balance):

Laws adopted in 2023 strengthen rights related to parental leave and flexible working arrangements. [equalitylaw.eu]

4. Gender Equality Governance

Ministry for Gender Equality and Diversity:

Established in 2015, responsible for implementing gender mainstreaming and coordinating the National Action Plan on Gender Equality (NAP), which includes measures on workplace equality, combating stereotypes, and preventing gender-based violence.

[eige.europa.eu], [luxembourg.public.lu]

5. Anti-Harassment & Violence

Luxembourg law prohibits sexual harassment and moral harassment in the workplace. The Convention on Harassment and Violence at Work (2009) applies until specific legislation on moral harassment is finalized. [cms.law]

6. Plan d’Action National – pour une égalité entre les femmes et les hommes [<https://gouvernement.lu/dam-assets/images-documents/actualites/2025/03/31-mega-pan-2025/pan-2025-mega.pdf>]



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