



Natolin

Equality, Diversity and Inclusion at the College of Europe in Natolin

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Introduction

Since its establishment in 1992, the College of Europe in Natolin has acknowledged the importance of equality, diversity and inclusion for the European Project and our mission. As a community at the College of Europe in Natolin:

1. We commit to creating an atmosphere of respect for equality and diversity of students, staff, and faculty.
2. We commit to strengthening mutual respect and courtesy in all interactions between the students, faculty, and staff of the College of Europe in Natolin.
3. We commit to raising awareness and supporting equality, diversity and inclusion among students, staff, and faculty.
4. We commit to act against any form of discrimination or mobbing as set out in the Policy against Discrimination and Mobbing.

In order to uphold and strengthen these values in our community a **Policy against Discrimination and Mobbing was first adopted in June 2017**. Since then, the Policy has been regularly reviewed.

In order to promote and safeguard Equality, Diversity and Inclusion based on "gender, age, race, religion, nationality, political belief, ethnicity, religious denomination, language and culture, sexual orientation, disability or parental status" the role of the **Advocate for Equality, Diversity and Inclusion was created in July 2021**.

The Advocate for Equality, Diversity and Inclusion is responsible for counteracting discrimination and exclusion and promoting diversity, through:

- assessing needs and supporting initiatives on equality, diversity, and inclusion;
- offering consultation in the field of care for equality, diversity, and inclusion;
- counteracting all forms of discrimination and exclusion;
- taking adequate and fair measures in the event of reporting an alleged violation in the field of equality or exclusion.

In 2022, an Equality, Diversity and Inclusion Plan was adopted outlining the ways in which we currently promote and safeguard our values, and how we plan to develop our approach in the near future.

At the beginning of every Academic Year, students are introduced to all the above policies and mechanisms, the role of the Advocate, and the availability of the onsite Counsellor. At the same time our students take part in an obligatory **Consent & Boundaries Workshop** to ensure that the College of Europe in Natolin is a safe and comfortable space for all.



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Policy Against Discrimination and Mobbing

Appendix no. 1 to Order no 2017/VI/01/Z of the Executive Board of the College of Europe of 2 June 2017; consolidated version from 2021.

§ 1

1. The College of Europe in Natolin follows a general attitude of zero tolerance for any acts of discrimination or mobbing, it being a violation of dignity of an individual, and expects mutual respect and courtesy in all interactions between the students, faculty and staff of the College of Europe in Natolin. Zero tolerance also applies to mobbing in relations between employees.
2. The awareness of different forms of unequal treatment, as well as preventing mobbing, intolerance and stalking, along with the concern for empathetic approach in the relations between members of the College of Europe in Natolin Community are crucial for the well-being of each and every Member of that Community and the community as a whole.
3. This Policy identifies the rules protecting the atmosphere of trust and collegiality within the Community of the College of Europe in Natolin.
4. The Policy is also a source of relevant procedures of seeking a remedy to those, who believe that have been exposed to any discriminatory act (the Subject, the Person Filing the Complaint) at the same time providing the accused of the violation (alleged offender, Person Complained Against) a fair opportunity to be heard.

§ 2

1. Discrimination occurs when people are treated less favourably than others in a comparable situation only because they belong or are perceived to belong to a certain group or category of people. Discrimination can take a form of unequal treatment, in particular based on sex, age, disability, race, religion, nationality, political belief, ethnicity, religious denomination, language and culture, sexual orientation, parental status, fixed-term or indefinite employment, full-time or part-time employment. Employees should be treated equally as regards entering into and terminating employment, terms of employment, promotion and access to training to improve their professional qualifications.

Equal treatment means non-discrimination in any way, directly or indirectly.

Direct discrimination exists when a given person, for one or more of the reasons set out above, was, is, or could be treated in a comparable situation less favourably than other persons.

Indirect discrimination exists when, as a result of a seemingly neutral provision, criterion applied or action taken, there are or could occur unfavourable disproportions or a particularly unfavourable situation with regard to all or a significant number of persons belonging to a group distinguished due to one or more of the reasons specified above, unless the provision, the criterion or action is objectively justified in terms of the lawful aim to be achieved, and the means of achieving that aim are appropriate and necessary.

A manifestation of discrimination is also an action consisting in encouraging another person to breach the principle of equal treatment or ordering another person to violate this principle.

Harassment is a form of discrimination.

2. Mobbing means actions or behaviours concerning an employee or directed against an employee, consisting in persistent and prolonged harassment or intimidation of an employee, causing him/her to a lowered assessment of his or her professional suitability, causing or aimed at



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humiliating or ridiculing the employee, isolating the employee or eliminating this person from the team of co-workers. Mobbing is a long-term, persistent, deliberate activity and, unlike discrimination, it does not have to refer to a legally protected characteristic (such as age, disability, sex).

3. Intolerance is a lack of respect for practices or beliefs other than one's own, including the rejection of people whom we perceive as different, for example people who are different in political or sexual orientation. Intolerance can manifest itself in a wide range of actions, from avoidance through hate speech to aggressive behaviours.
4. Stalking is persistent harassment of another person or their closest person, which gives rise to a sense of threat justified by circumstances, or which significantly violates their privacy. It can take the form of an action consisting of repeated phone calls, leaving voice messages or sending electronic messages or posts, tracking or following, as well as harassing in order to obtain information about the private life of the harassed person as well as impersonating another person, using his/her image or his/her other personal data in order to cause him or her financial or personal damage.

§ 3

1. As far as harassment is concerned, it can take various forms.
2. Personal harassment is a lack of tolerance of personal difference, including ridiculing based on personal circumstances or appearance.
3. Moral harassment is any repeated behaviour to the purpose or with the effect of undermining the dignity of another person or creating an intimidating, hostile, humiliating or offensive conditions.
4. Racial harassment is an offensive action aimed at one's racial or ethnic origin. It may manifest by racially motivated display of images in any form, as well as intimidating behaviour, such as offensive or threatening gestures.
5. Sexual harassment is a behaviour, which may include, but is not limited to unwanted touching, jokes of sexual nature, inappropriate use of suggestive visual displays or pressing for sexual actions in return for a positive result of a certain situation.
6. Harassment based on the grounds of one's sexual orientation is an offensive treatment, including comments and remarks concerning one's sexual orientation or threats to reveal one's sexual orientation against the will of the person concerned.
7. Harassment based on one's disability is an action that undermines personal dignity of a disabled person, which may include but is not limited to staring, offensive questions or disrespectful remarks.
8. Age based harassment is an action that unjustifiably dismisses one's commitment, competence, dutifulness and professional suitability on the grounds of age.
9. Bullying is a form of psychological or/and physical harassment, which is represented by intimidation, including gossiping, spreading of rumours, unmerited criticism or social isolation of the person concerned.

§ 4

1. In the event of being the Subject to any of the behaviour categories mentioned in § 2 and § 3, this person (the Subject) will be guaranteed a fair procedure for seeking remedy and, at the same time, the person whose behaviour is in question (Person Complained Against) will be afforded a fair opportunity to be heard.



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2. All proceedings related to a specific case are confidential. Disclosure of any information related to a case by a person involved may be subject to disciplinary actions.

§ 5

1. At the beginning of each academic year, by the joint decision of the Vice-Rector, Director General, Director of Studies together with the Director of the Finance and Accounting Office, two members of the staff will be chosen to serve as Confidants. The nomination will be announced to the students, faculty, and staff.

§ 6

1. Any student or a member of the faculty or staff of the College of Europe in Natolin, who believes that can be considered as the Subject of any of the behaviour categories mentioned in § 2 and § 3, or has been a witness to such behaviours or actions (the Witness) may seek assistance with the Confidant to discuss the situation.
2. The Confidant immediately invites the Subject or the Witness to a meeting. During the first meeting, the Confidant hears the account of the Subject and / or the Witness as to the course of events; the Confidant also hears explanations of the Person Complained Against.

§ 7

1. After hearing the persons referred to in § 6.2, the Confidant may decide to initiate one of the following two procedures:
 - a. the Mitigation procedure,
 - b. the Formal procedure.

§ 8

1. As part of the Mitigation procedure, the Confidant assesses the probability of violation of § 2 or § 3 of the Policy and the seriousness of such violation.
2. After the assessment referred to in section 1, the Confidant proposes an amicable settlement to the dispute or initiates a formal procedure. The refusal of the Subject or the Person Complained Against to submit to an amicable settlement of the dispute is tantamount to the obligation to initiate a formal procedure.
3. Amicable settlement of the dispute may end in particular by:
 - a. an apology,
 - b. an agreed plan of action to avoid further incidents,
 - c. in case of students, separate course assignments, separate groups during study trips and separate extracurricular activities,
 - d. a request to the Vice-Rector or the Director General to issue an instruction or admonition.

The measures referred to in § 8.3 may be applied jointly.

4. The Mitigation procedure should be completed in 21 working days from the first meeting referred to in § 6. 2.

§ 9

1. The formal procedure is initiated by the Confidant on the basis of a formal complaint by way of a decision that contains charges against the alleged offender.



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2. The Confidant shall immediately inform the Subject and the Person Complained Against (the Parties) about the initiation of the formal procedure by sending them by e-mail a copy of the decision to initiate the formal procedure.
3. The parties to the procedure may take a position on the allegations contained in the decision no later than within 2 weeks from the date of receipt of the decision.
4. Upon the expiry of the deadline for the parties to the procedure to take the position, the Confidant immediately calls the Committee. The Committee should meet within 3 working days from the call.
5. The meetings of the Committee may be held online.

§ 10

1. The Committee's composition is as follows.
2. Where the Parties are students:
 - a. the Confidant as the Chair,
 - b. one Student Representative,
 - c. the Student Confidant,each having one vote.
3. Where Parties are a faculty or a staff member and a student:
 - a. the Confidant as the Chair,
 - b. one Student Representative,
 - c. the Student Confidant,
 - d. Head of HR of the College of Europe,each having one vote; if the votes are evenly split, the Chair has a casting vote.
4. Where Parties are faculty or staff members:
 - a. the Confidant as the Chair,
 - b. the second Confidant,
 - c. Head of HR of the College of Europe,each having one vote.

§ 11

1. The Committee takes its decision at the meeting after deliberation. Only the Committee members are present for the final deliberations.
2. At the first meeting of the Committee, the Chairman presents to its members the content of the complaint and the response to the complaint, provides documents for inspection by members of the Committee. These documents may not be copied or removed from the meeting room by members of the Committee. If the meeting is held online, the presented documents may not be printed or copied by members of the Committee.
3. On the request of the Committee, the Chair may invite the Subject and the Person Complained Against for separate meetings with the Committee.



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4. The purpose of the hearings of the Parties is to determine the facts in the most objective manner possible; in this respect, each Party can submit requests for admission of evidence documents or witness testimonies.
5. The Chair will make every effort to guarantee the objectivity and impartiality of the work of the Committee.
6. Information relating to the proceedings is strictly confidential.
7. The Committee can reach the following final conclusions:
 - a. it can uphold the complaint, finding that events occurred substantially as they are described in the complaint,
 - b. it can find that there is no basis for the complaint and that events described in the complaint did not occur,
 - c. it can find that there is insufficient information to uphold or to refute the complaint,
 - d. it can find that there is no basis for the complaint because the events described in the complaint did not occur and the complaint is malicious or frivolous.
8. If the Committee determines that the acts mentioned in § 2 and § 3 have occurred or that the complaint is malicious or frivolous the Committee can propose solutions or sanctions which may include:
 - a. sincere apology,
 - b. an agreed plan of action to avoid further incidents,
 - c. in case of students, separate course assignments, separate groups during study trips, separate extracurricular activities,
 - d. a warning issued to the employee,
 - e. a reprimand issued for the employee,
 - f. a recommendation to penalize by expulsion the student from the College in accordance with Article 9 of the Study Regulations, or termination of the contract of employment with an employee of the College of Europe in Natolin due to a gross breach of the employee's duties towards the employer or termination of another contract binding the Party with the College,
 - g. in case of the mobbing, if the Committee finds that events occurred substantially as they are described in the complaint, only sanctions can be recommended, including recommendation to penalize by termination of the contract of employment with an employee of the College of Europe in Natolin due to a gross breach of the employee's duties towards the employer or termination of another contract binding the Party with the College.
9. The Chair of the Committee prepares minutes about the conclusions of the Committee's final deliberations and proposed solutions and sanctions.
10. Within 21 working days from the submission of the formal complaint the procedure should be completed.
11. The Chair of the Committee informs the Vice-Rector or/and the Director General or the Executive Board of the College, depending on their competence, about the conclusions of the proceedings as well as the recommended solutions and sanctions.
12. Vice-Rector or/and the Director General or the Executive Board of the College immediately



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decides whether to apply the recommended solutions and sanctions and informs the Parties about this decision at the joint meeting or at two separate meetings.

§ 12

1. If the Committee conclusions, recommended solutions and sanctions concern an expulsion of the student from the College, the Vice-Rector presents this recommendation to the Academic Council in order for it to make a final decision on the expulsion of a student, pursuant to Article 9 of the Study Regulations.

§ 13

1. In the event that it is necessary to supplement the composition of the Committee due to the exclusion of a member (conflict of interest) or other situations not provided for in this Policy, the missing member of the Committee shall be selected by the remaining members of the Committee from within the same representative group.

§ 14

1. In matters not covered by this Policy, the Study Regulations of the College of Europe, the Work Regulations of the College of Europe in Natolin, and the provisions of the Polish and international law shall apply. The provisions of these Regulations and legal provisions also apply when the Parties fail to implement or comply with the procedures provided for in this Policy.

§ 15

1. Every student, faculty member and employee of the College of Europe in Natolin is required to read the Policy against Discrimination and Mobbing.
2. The employee's statement on having become familiarized with the Policy against Discrimination and Mobbing is attached to the employee's personal files.



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Equality, Diversity, and Inclusion Plan

1. Guiding principles

Since its foundation in 1992 the College of Europe in Natolin has been a multinational institute of postgraduate studies. The very idea of its creation was to create a diverse community of university graduates from different countries who would jointly study the European integration process and by working and living together, come to better understand their respective cultures and countries and ultimately contribute to the European Project. In the last 10 years, the student body every year consequently consists of c. 130 students from c. 30 countries, with an equally international body of staff coming from c. 20 countries.

2. Value based commitments and goal goals

The diversity of the community has always been at the heart of the College of Europe in Natolin and is reflected in the number of countries or students come from, in their diverse social and educational background and in the gender balance. Moreover, it must be noted that over 100 professors, experts and civil servants forming a multicultural “flying faculty” and representing a diversity of teaching approaches, social and educational backgrounds, annually contribute to the academic programme.

Outside of the official academic programme, students are offered a rich set of extracurricular debates, lectures and seminars and conferences. These formats offer a unique forum for discussion and analysis of European affairs, issues related to *inter alia* the fundamental principles of freedom, democracy, equality, dignity, or the respect for human rights, all of which lie at the heart of the European integration process and European values as such.

This care and attention paid to the composition of the small community that lives together on the campus located next to a natural reserve has always been one of the key guiding principles in recruiting students and staff.

Acknowledging the importance of **equality, diversity and inclusion** for the European Project and our mission, we consistently strive to support its potential on the ground of these values. Therefore, as a community at the College of Europe Natolin:

- We commit to creating an atmosphere of respect for equality and diversity among students and staff.
- We commit to strengthening an empathetic approach and mutual respect and courtesy in all interactions between the students and staff of the College of Europe in Natolin.
- We commit to raising awareness and supporting equality, diversity and inclusion among students and staff.
- We commit to identifying any potential gender biases and developing innovative strategies to address them.
- We commit to act against any form of discrimination or mobbing as set out in the Policy against Discrimination and Mobbing.



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3. Where we currently stand in implementing the values of equality diversity and inclusion

The composition of the student and permanent staff bodies, together forming the community, reflects the values that we aim to uphold:

- In the academic year 2023-2024 we had students of 33 nationalities (55% Female, 45% male), with staff of 20 nationalities (49% female, 51% male).
- In the academic year 2024-2025 we had students of 30 nationalities (59% female, 41% male), with staff of 18 nationalities (48% female, 52% male).
- In the academic year of 2025-2026 we had students of 33 nationalities (49.5% female, 49.5 male), with staff of 15 nationalities (49% female, 51% male).

This gender balanced and diverse community is a result of systematic care and effort by the administration to uphold and secure the diversity of our community.

In our understanding of diversity, we focus not only gender balance, but we see equality, diversity and inclusion as referring to "sex, age, disability, race, religion, nationality, political belief, ethnicity, religious denomination, language and culture, sexual orientation and parental status".

To strengthen and uphold these values the role of an Advocate for Equality, Diversity and Inclusion was formally adopted in July 2021.

The Advocate for Equality, Diversity and Inclusion is responsible for promoting diversity and counteracting discrimination and exclusion, through:

- conducting an assessment of needs and supporting initiatives on equality, diversity and inclusion;
- offering consultation in the field of care for equality, diversity and inclusion;
- counteracting all forms of discrimination and exclusion;
- in the event of reporting of an alleged violation of equality, diversity or inclusion, helping to diagnose the problem, choosing the method of its solution, inter alia by recommending and carrying out mediation.

In selecting a staff member to take this responsibility, we put great care into selecting a person who has the professional and personal capabilities to address these issues in a professional and empathetic manner.

In case a student or staff member feels these values are not being upheld, or would feel discriminated against, they can follow the procedure outlined in our Policy against Discrimination and Mobbing.

The Policy was first adopted in June 2017. Since then, the Policy has been reviewed regularly and was updated twice, with the last update was done in the summer of 2021.

The Policy on the one hand complements the Code of Conduct and Conflict of Interest Guidelines and the Student Code of Conduct, by clearly stating the expected values and boundaries in mutual interactions within the community, at the same time offering a clear procedure to report, address and proceed in case discrimination or mobbing would occur.

The Policy and the role of the Advocate for Equality, Diversity and Inclusion are introduced during the beginning of each academic year.

The College of Europe in Natolin is committed to creating an accessible and inclusive environment for students and staff, especially those with specific **disabilities**. Over the years, based on the feedback from the students and staff, there have been numerous adjustments made in a facilities to allow



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wheelchair access to the venues.

Students and staff can also benefit from the support of our Academic and ICT departments, who are prepared to provide solutions for students, in particular with speech or hearing impairment.

4. Equality, diversity, and inclusion Plan - moving forward

Our Equality, diversity and inclusion plan is based on continuing good practices and developing new ones.

a. Raising awareness and monitoring of equality, diversity, and inclusion in the community

At the beginning of each academic year several initiatives are implemented with the aim of underlining the importance of these values and supporting students and staff in taking responsibility for upholding them in the daily life of the campus community.

- **Cross-Cultural Communication Workshop**

The objective of this workshop is to provide participants with an awareness and an understanding of the issues that allow them to communicate effectively across cultures. The learning outcomes associated with this workshop are the following:

- Identity and Intercultural Communication - explaining the concepts of culture and identity and providing an understanding of the socialization and categorization of individuals into cultural groupings and its consequences for communicating cross-culturally.
- Understanding Cultural Difference - providing an appreciation of general cultural differences and how these impact the patterns of interaction and the communication process.
- Intercultural Effectiveness and Competence - enabling participants to better understand and be prepared to deal with a broad cross-section of people from a range of cultures.

- **Consent & Boundaries Workshop**

This workshop is a milestone in our Natolin-resident community. It is a crucial part of our programme to ensure that the College is a safe space for all. The program is designed in an interactive way that allows to exchange and express views freely, while acquiring new knowledge. By the end of the workshop, participants will have a space for reflection on the importance of consent and personal boundaries, and they will get to know the concept of consent. Moreover, the workshop will give a clear explanation of how to give consent and how to act when they see potentially dangerous situations.

- A meeting with the Advocate for Equality, Diversity and Inclusion with students and staff to inform them about:
 - the College of Europe in Natolin holding strong stance and commitment on upholding values of Equality, Diversity, and Inclusion;
 - whom they can reach out to if they feel these values are not respected (Advocate for Equality, Diversity, and Inclusion);
 - what policies and procedures are in place to safeguard these values in the community (Student and Staff Code of Conducts, Policy against Discrimination and Mobbing).



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- A review session at the during the first semester with the students and, organized by the Advocate for Equality, Diversity to discuss their respective experience in the community during the first weeks and to address any concerns that might have surfaced.
 - Monthly check-in with the Student Representatives and the Social Committee, monitoring whether any issues have arisen and potentially how to address/mitigate them.

b. End of the year review and recommendations for the future - Natolin Consultation Days

Every year in the last month of the academic year, students receive a comprehensive “End of the Year Survey”, where they assess and comment on their campus experience, the academic and service offer. Part of the survey is dedicated to inquiring about any potential issues that might have occurred during the academic year regarding equality, diversity, and inclusion in the community - i.e., discrimination or breaching of boundaries. The results of this survey are analysed in detail by respective departments to identify what went well and what could be done differently, and to prepare proposals of solutions or improvements for the next academic year. The month of July is dedicated to numerous consultation sessions, when various working groups reflect on the passing academic year, discuss the above-mentioned proposals for improvements and decide which are to be implemented in the coming year.

- To be implemented:
 - The Advocate for Equality, Diversity, and Inclusion will prepare and send a separate survey sent to staff members (Staff Equality Diversity and Inclusion Survey) to inquire about their assessment of how from their perspective these values were observed and upheld during the academic year.
 - The Advocate will meet with respective Heads of Offices to discuss the survey results and inquire about any additional comments or observations. Individual, face-to-face meetings give the opportunity to discuss more comfortably any challenges or needs identified in respective departments.
 - Based on the End of the Year Student Survey, the Staff Equality Diversity and Inclusion Survey and individual meetings with Heads of Offices, the Advocate prepares a summary with recommendations and presents them at a respective consultation meeting to the Heads of Offices and the Vice-Rector. The decisions taken during this meeting will be then implemented by the Advocate or respective Heads of Offices in the new academic year.