



Brugge

College of Europe
Collège d'Europe



Natolin

**EQUALITY, DIVERSITY
& INCLUSION AT
THE COLLEGE OF EUROPE
IN NATOLIN**

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INTRODUCTION

Since its establishment in 1992, the College of Europe in Natolin acknowledges 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 Natolin campus.
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 of countermeasures 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 (last update summer 2021). There were no more than ten cases to date which concerned boundaries in interpersonal relations amongst students and were resolved through mediation and boundary setting.

The Policy ties in with the **Code of Conduct and Conflict of Interest Guidelines (2015)** along with the **Student Code of Conduct (2022)**. These three documents clearly define the expected values and boundaries in mutual interactions within the community. At the same time, they offer a clear procedure to report, address and act in case discrimination or mobbing would occur.

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**, and the same year an **Equality, Diversity and Inclusion Charter** was adopted.

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 which outlines 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.

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

Policy of countermeasures against discrimination and harassments /consolidated text^{1/}

I. General rules and definitions

§ 1. 1. The College of Europe Natolin campus follows a general attitude of zero tolerance for any acts of discrimination, it being a violation / abuse 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 Natolin campus.

2. The awareness of different forms of unequal treatment, as well as the empathic approach in the relations between members of the College of Europe Natolin campus Community are crucial for a well-being of each and every Member of that Community and the community as a whole.

3. This policy identifies the rules of protection of the atmosphere of trust and collegiality in the Community of the College of Europe Natolin campus.

The Policy is also a source of a relevant procedure of a process of seeking a remedy to those, who believe that have been exposed to any discriminatory act at the same time providing those accused of a violation a fair opportunity to be heard.

§ 2. 1. Discrimination² 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 because of age, disability, ethnicity, origin, political belief, race, religion, sex or gender, sexual orientation, language and culture.

2. Intolerance³ 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.

§ 3. 1. As far as harassment is concerned, it can take various forms. The same behaviour may be inoffensive to one person and deeply offensive and intimidating to another one. Unintentional or misinterpreted behaviour may cause feelings of harassment.

2. Personal harassment is a lack of tolerance of personal difference, including ridiculing of personal circumstances or appearance.

3. Moral harassment is any repeated behaviour to the purpose or with the effect of undermining the personal dignity of another person or to create an intimidating, hostile, humiliating or offensive conditions.

¹ The present consolidated text incorporates the content of Order No. 2017/VI/01/Z of the Executive Board of the College of Europe of 2 June 2017 regarding the policy of countermeasures against discrimination and harassment, which constitutes Appendix no. 1 to Resolution No. 24 of the Executive Board of the foundation College of Europe of 2 June 2017 regarding the policy of countermeasures against discrimination and harassments and regarding amendments to the Work Regulations, as well as amendments introduced by Resolution No. 3 of the Executive Board of the College of Europe of 10 December 2018 on the introduction of amendments to the policy of countermeasures against discrimination and harassment, and amendments introduced by Resolution No. 11 of the Executive Board of the College of Europe adopted on 7 June 2019 regarding amendments to the Policy of countermeasures against discrimination and harassments.

² <http://www.coe.int/en/web/compass/discrimination-and-intolerance>

³ Ibid.

4. Racial harassment is a racially or ethnically offensive action about racial or ethnic origin, racially motivated display of images in any form, as well as intimidating behaviour, such as offensive or threatening gestures.

5. Sexual harassment is an unwanted, intimidating behaviour, such as asking for sexual favours in return for a positive result of a given situation. Examples include unnecessary touching, jokes of a sexual nature, inappropriate use of suggestive visual displays.

6. Harassment on grounds of sexual orientation is an offensive treatment, including homophobic comments or remarks, threats to reveal sexuality against the will of a person.

7. Harassment of disabled people is an action that undermines personal dignity of disabled people, including staring, unwanted touching, offensive questions about the impact that the disability has on the life of the disabled person.

8. Age harassment is an action that unjustifiably dismisses the commitment, competence, dutifulness and professional suitability on the grounds of the age of the person. Examples of such harassment include age-related remarks.

9. Bullying is a form of psychological or/and physical harassment, which is represented by intimidation, including gossiping, spreading of untrue stories, unmerited criticism or isolation.

10. Stalking is an unwanted action consisting of repeated or alarming phone calls, voice or @mail messages, following people or becoming a nuisance in order to obtain information about the private life of a person.

§ 4. 1. In the event of reporting behaviour which may be qualified as discrimination or harassment, a person who considers himself/herself to be a victim of such action (the Plaintiff) will be guaranteed an effective procedure for seeking remedy and, at the same time, the person accused of the commission of an act of discrimination or harassment (the Defendant) will be afforded a fair opportunity to be heard.

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. The College of Europe Natolin campus appoints two members of the staff to serve as confidants, namely:

- a) The Director responsible for coordination of student affairs, and
- b) An academic assistant designated by the Vice-Rector in consultation with the Director of Studies

2. A student or a member of the staff of the College of Europe Natolin campus, who believes that she/he has been discriminated against or harassed (the Plaintiff), or has been a witness to such behaviours towards a third party may request first a meeting with the external psychological counsellor (contact: counsellor1.pl@coleurope.eu) to discuss the situation and ways to proceed about it, or directly contact the Confidants to discuss the situation and ways to proceed about it.

If the Person informing of the behaviour/situation is a witness to the situation, and confirms her/his wish to file a complaint in discussion with the Confidant, the Confidant will contact the person who was indicated as being subject to discrimination or harassment, discuss with her/him the situation, and ask that person whether and/or what solution would be appropriate for her/him. If the person who was subject to this behaviour upholds the complaint of the witness, the Confidants continue with the Procedure. However, if the Person does not wish to uphold the complaint of the witness or suggests another solution, who was subject to this behaviour does not wish to uphold the complaint, or suggests a different solution – the Procedure is not taken forward.

3. During the first meeting, the confidant:

- a) listens to the Plaintiff's account of events,
- b) gives the Plaintiff information about the policy described herein, and - if appropriate and requested by the Plaintiff - sets the date of a second meeting.

§ 6. Following the first meeting with the Plaintiff, the confidant informs the other confidant of the Plaintiff's account of events. The topic presented by the Plaintiff is discussed by both confidants and they agree upon the recommendation to be made to the Plaintiff at the second meeting. No-one communicates at this point with the person complained against (the Defendant).

§ 7. 1. During the second meeting with the Plaintiff, the confidant presents three possible solutions concerning the submitted complaint:

- a) an informal procedure to educate the Defendant complained against;
- b) submission of a formal complaint;
- c) waiver to lodge a complaint because: basic facts may not be verified; something clearly occurred but it doesn't fall under the discrimination or harassment definition; there is not enough evidence to pursue a charge.

2. The confidant informs the Plaintiff that both in the case of a choice of the informal procedure and lodging a formal complaint, this fact and the Plaintiff's name will be revealed to the Defendant, unless some elements of the complaint indicate that doing so would put the Plaintiff in danger. The Plaintiff decides what course she/he wishes to pursue.

3. If the Plaintiff decides to pursue an informal procedure or lodge a formal complaint, she/he is obliged to provide a written statement of facts. Such statement can be prepared by the Plaintiff during the second meeting with the confidant or sent via @mail to the confidant within 2 days of the date of that meeting.

4. If the Plaintiff decides to lodge a formal complaint, it needs to be delivered to the confidant together with the statement of facts within 2 days of the date of the second meeting.

5. If the formal complaint and the statement of facts are not received within the set deadline by the confidant, the confidant contacts the Plaintiff in order to find out why the formal complaint has not been lodged.

II. Informal procedure

§ 8. 1. If, during the second meeting, the Plaintiff chooses to start the informal procedure, the confidant initiates it by contacting the Defendant. The confidant contacts the Defendant via @mail, describes to her/him the general nature of the complaint without revealing the Plaintiff's name, and sets up a meeting with the Defendant within 7 days of the date of the first contact with the Defendant.

2. During the meeting with the Defendant which occurs in the presence of both confidants:

- a) the complaint is presented,
- b) the Defendant is informed that the procedure she/he participates in is an informal procedure and is made aware of the rules related thereto,
- c) the Defendant is asked for a written response to the submitted complaint, giving her/him the option of responding in the course of the meeting or within 2 working days.

§ 9. 1. The relevant explanations and statement by the Defendant in this regard is sent via @mail to both Confidants within 2 days of the date of the meeting. These explanations are then communicated by the Confidant to the Plaintiff. Depending on the explanations of the Defendant, one of the following procedures may be implemented in the matter:

- a) the Defendant complained against, can confirm the facts presented in the complaint or present them in a different light, but at the same time admit that she/he was unaware of the impact of her/his behaviour/actions against the Plaintiff and therefore she/he commits to changing the behaviour which formed the grounds for lodging the complaint. In such case, the Plaintiff informs the confidants within 2 days of the date of receipt of the explanations of the Defendant whether she/he accepts them. If so, the case is closed.
- b) If the Plaintiff does not accept the explanations of the Defendant or if the facts presented by the Defendant differ significantly from the Plaintiffs account of the facts and if there is no other solution reached that would be accepted by both sides, the Plaintiff has a right to lodge a formal complaint.

III. Formal complaint

§ 10. 1. If, as a result of the second meeting with the confidant, the Plaintiff chooses to lodge a formal complaint, the confidant initiates the formal complaint procedure by contacting the Defendant. The formal complaint procedure is also instituted in the event that informal proceedings do not result in the amicable settlement of the case between the parties. In such circumstances, the provisions of sections 2 and 3 do not apply.

2. When the formal complaints is lodged, the confidant contacts the Defendant, describes to her/him the nature of the complaint without revealing the Plaintiff's name, and sets up a meeting within 5 days of the date of submission of the complaint.

3. The meeting with the Defendant takes place in the presence of two confidants. During the meeting:

- a) the Plaintiff's complaint is presented to the Defendant,
- b) the Defendant is informed that the procedure she/he participates in is a formal procedure and is made aware of the rules related thereto,
- c) the Defendant is asked for a written response to the submitted complaint, giving her/him the option of responding in the course of the meeting or within 2 working days.

4. A formal complaint is considered by a Committee composed of four members, covering the following persons who have a right of vote:

- a) one student representative with a right of 1 vote,
- b) one academic assistant or staff member with a right of 1 vote,
- c) one permanent professor or director of studies with a right of 1 vote, and one of the confidants as a non-voting chair.

5. The composition of the Committee is each time approved by the Vice-Rector of the College of Europe Natolin campus.

6. The committee members holding the right of vote are informed by the Chairman of the Committee of the background of the case before the hearing of the parties.

7. The Chairman of the Committee will make every effort to guarantee the objectivity and impartiality of the Committee. The parties are entitled to apply for replacement of specific members of the Committee by other persons from the same representation group.

8. The parties may have with them another student or a members of the staff of the College of Europe to act as a support during the hearing before the Committee, provided that they specify the names of the supporting student and member of staff at least a day before the hearing of the party.

9. The personal data of the Plaintiff and the Defendant remain confidential both during and after the end of the proceedings.

§ 11. 1. The purpose of the hearing of the parties is for the Committee to determine the fact in the most objective manner possible. In this regard, each party has a right to submit requests for admission of evidence, both in the form of documents (e.g. @mail or text messages print-outs) and in the form of witness testimonies.

2. Any statements, explanations and requests must be submitted by the parties in writing. An @mail message will also be considered a written form.

3. Only the Committee members are present for the final deliberations.

§ 12. 1. The Committee can reach the following final conclusions:

- a) it can uphold the Formal Complaint, finding that events occurred substantially as the complaint describes them;
- b) it can find that there is no basis for the complaint and that events did not occur as described in the complaint;
- 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 did not occur as described in the complaint, and the complaint is malicious or frivolous.

2. If the Committee determines that an act of discrimination or harassment has occurred or that the complaint is malicious or frivolous, the members of the Committee agree on the level of sanction they wish to recommend in writing to the Vice-Rector.

3. The Committee should strive for unanimity, but where unanimity cannot be achieved, an ordinary majority of votes can decide.

4. The Committee may recommend in particular the prohibition of further contact between the parties concerned, expulsion from the College in accordance to Section 1.4 entitled "Ethics" of the Study Regulations, or terminate the contract of employment with a member of the staff of the College of Europe Natolin campus due to a gross breach by the employee of her/his duties towards the Employer.

§ 13. 1. The parties are informed by the Committee orally of the results of its findings, but not of the wording of the recommendation.

2. The Committee reports its findings, recommendation for sanctions and its justification, as well as the votes' allocation in writing to the Vice-Rector. The Vice-Rector has an insight into the votes.

3. The received recommendations are presented by the Vice-Rector to:

- a) the Academic Council of the College of Europe, if they concern the expulsion of a College student,
- b) the Executive Board of the College of Europe Natolin campus, if they concern the termination of contract of a member of the College staff.

§ 14. The parties are informed by the Committee orally of the results of its findings, but not of the wording of the recommendation.

§ 15. A decision on the matter of execution of the recommendations mentioned in § 13.3 above is taken by:

- a) the Academic Council of the College of Europe, if they concern the expulsion of a College student,
- b) the Executive Board of the College of Europe Natolin campus, if they concern the termination of contract of a member of the College staff.

§ 16. In all matters not governed by this Policy of Countermeasures against Discrimination and Harassment, the provisions of the Study Regulations of the College of Europe and the provisions of the Polish and international law on countermeasures against discrimination and harassment shall apply.

CODE OF CONDUCT AND CONFLICT OF INTEREST GUIDELINES

Attachment to the resolution no 14 of the Executive Board of the College of Europe of 27 April 2015

Code of Conduct and Conflict of Interest Guidelines College of Europe (Natolin Campus)

Introduction

The College of Europe Natolin Campus (henceforth referred to as “the College of Europe”, “the College” or “the Campus”) came into being in 1992, initially as the branch of the College of Europe in Bruges, and was the first European educational institution of its kind in Central and Eastern Europe. In 1994, the Government of Poland and the College of Europe Bruges signed an agreement on the establishment of the branch of the College of Europe in Natolin. In 1999, the trilateral Agreement between the Government of Poland, the European Commission and College of Europe concerning the development of Natolin Campus was signed, defining the obligations of the three sides and establishing that the Natolin Campus would function as a separate legal entity.

Since 2001, the College of Europe (Natolin campus) is a legal entity duly registered under the laws of the Republic of Poland, with its own budget, financial accountability and HRM.

The program of interdisciplinary European studies offered by the College allows the students of the College to become acquainted with the process of European integration in a manner that crosses over and reaches beyond individual disciplines such as law, economics and socio-political studies. The program of studies in Natolin is an excellent opportunity to gain unique knowledge and experience beneficial for further professional development.

In addition, since 2004, the Natolin Campus has specialised in the European Neighbourhood Policy and – by virtue of the European Parliament’s decision – in the academic year 2011/2012 established the European Neighbourhood Policy Chair. Thanks to a special scholarship programme of the European Commission, the Natolin Campus hosts a proportionally significant number of students from countries covered by the ENP. In 2010, the Natolin campus of the College of Europe established the European Civilisation Chair, funded by the European Parliament.

Our educational mission, in addition to enabling the students to gain knowledge on European integration, law and institutions, on European civilisation and history, and on European Neighbourhood Policy, prepares the students for future positions in EU institutions, international organisations, EU and ENP governments and administrations, academia, or the private sector. The way in which the Campus staff and other employees carry out their work should serve as example for these future elites. Given that the College of Europe is financed by public resources, it is of utmost importance that we conduct our work transparently, responsibly and with clear accountability.

The present Code of Conduct and Conflict of Interest Guidelines document is to serve as a guidance tool and policy document for staff and other employees⁴; its provisions complement, clarify and stand without prejudice to the provisions contained in the Work Regulations in force. The Code of Conduct and Conflict of Interest Guidelines, as adopted by the College of Europe (Natolin Campus) Board, form an integral part of internal rules and regulations, and breaches of its provisions will entail sanctions as noted in this Code and Guidelines.

⁴ “Staff” is understood as persons employed based on the labour law employment contracts; “other employees” is understood as persons engaged based on civil law contracts, with the exception of the “flying faculty” members.

I. Code of Conduct

Our staff and other employees must comport themselves with objectivity and impartiality, and conduct the College of Europe's affairs with a commitment to the highest standards of integrity, ethics and honesty. The staff and other employees must treat one another – as well as contracted consultants and any third parties – with courtesy, respect, professionalism and civility.

1. Compliance with laws and regulations

Staff members and other employees should comply with all the laws and regulations applicable to the College of Europe and to individual staff members and other employees, both in view of potential civil penalties and criminal charges. When travelling abroad on College business, staff members and other employees should respect local laws and regulations in force. If and when travelling on College business to post-conflict, fragile or authoritarian settings, while striving to comply with local laws and regulations, they should make utmost efforts not to endanger themselves, colleagues and/or College of Europe Natolin Campus contacts.

2. Research Code of Conduct

Taking into account the specificity of academic endeavours, a Research Code of Conduct may be developed separately.

3. Publications and speaking engagements

- i) Staff and other employees should inform the Employer by email of any significant speaking engagements and publications carried out on behalf of the College of Europe. Without prejudice to the principle of freedom of academic expression, speaking engagements and publications should be avoided where the interests of College of Europe Natolin Campus or the safety of its staff might be jeopardised.
- ii) Staff and other employees (with the exception of the “flying faculty”) wishing to publish – in their personal capacity – articles, books or other material that relate to the purpose, activities or interests of the College of Europe should inform the Employer of this intention by email.

When writing or speaking in their personal capacity, staff and other employees have to indicate this clearly and – without prejudice to the principle of freedom of academic expression – are expected to avoid comments that might adversely affect the interests of the College of Europe. Disclosure or non-disclosure of the staff or other employees' employment by the College of Europe will depend on the circumstances and should be consulted with the Employer.

4. Contacts with the media

Staff and other employees require the prior approval of the Employer for each instance of their contacts with the media on behalf of, or commenting on the College.

5. Political activities

Political activities are permitted in the personal capacities of staff and other employees if these activities do not conflict with their ability to fulfil their responsibilities and obligations vis-a-vis the College of Europe. However, utmost care should be given by staff and other employees to convey a clear message of their purely personal capacity when engaging in political activities. No such activities may be conducted during business hours and College of Europe resources must not be utilised for such purposes.

6. Confidentiality and disclosure of information

- i) Staff and other employees have a duty to maintain confidentiality of all information, including information on the performance of students, which they have gathered, prepared or received during the employment or contractual relationship, or in connection with or on the occasion of performing their obligations, concerning the Campus, the Campus' organisation, content of agreements entered, content and scope of planned activities, customers, counterparties and other entities cooperating with the College of Europe.
- ii) All the above information shall be kept confidential and not disclosed to third parties during employment and following termination thereof, unless such disclosure is in the interest of the College of Europe and with prior written approval of the Employer.

7. Intellectual property rights

The College of Europe owns all intellectual property rights to any products produced for or at the College that form part of contractual obligations of staff and other employees, including inter alia: reports, publications, concept notes, curricula, as well as ideas on and plans for development activities of the College and content of any grant or service provision tender or project documents developed by and for the College of Europe. In accordance with applicable rules of law and contractual obligations the College will not hinder use of work done by staff or other employees during their contractual engagement at the College in their future academic publications.

Staff and other employees will abide by intellectual property rights legislation, will honour and respect the intellectual property rights of the College of Europe, as well as the intellectual property rights of any third parties.

8. Equality and non-discrimination

The College of Europe is committed to equal treatment and non-discrimination, in accordance with the Polish legislation in force, and as stated in the Work Regulations in force.

9. Mobbing/Bullying and harassment

In agreement with the Work Regulations in force, any type of mobbing/bullying, harassment or retaliation, regardless of the identity and status of the offender, will not be tolerated. Reports of all such incidents will be dealt with fairly, impartially and in full confidence.

Incidents of mobbing/bullying, harassment or retaliation should be reported to the Employer, or the Chairman of the Board as appropriate, who – in each case – will appoint a panel to examine every case with due diligence and will take appropriate steps to remedy the situation. The panel will decide on merits of each complaint and on the imposition of appropriate sanctions, in accordance with Work Regulations and measures stated herein.

10. College of Europe Natolin Campus property

Staff and other employees are expected to exercise due care and diligence in the use of Campus property and to utilise such property only for authorised purposes. Unauthorised removal of Campus property from the premises is forbidden. In the event of any damage to or loss of Campus property, staff and other employees should notify their supervisor.

II. Conflict of Interest

1. Employment

The interests of the College of Europe take precedence over the interests of other employers or third parties, in accordance with the Polish legislation in force. The College of Europe Natolin Campus' full-time staff have a full-time responsibility to the Natolin Campus. Full-time non-support staff need – in each case – to inform the Employer by email of engaging in part-time employment, remunerated consultancies, private business or teaching assignments. Non-support staff and other employees should seek the prior written approval of the Employer if engaging in the above undertakings for, or with, entities that are competitive to the College of Europe interests and activities. Approval is granted if proposed outside activities do not constitute an actual or perceived conflict of interest.

Staff and other employees have a duty to inform the Employer of any instances of activities which pose a conflict of interest or which constitute competition to the activities of the College of Europe or which may stand to the detriment of the College's interests. Such reports will be treated diligently and with due confidence.

2. Consultancy and services/supply provision contracts

Consultancies and services/supply provision contracts cannot be made directly or indirectly to immediate family members or companies that employ immediate family members of staff and other employees. In case of non-immediate family members, granting such contracts cannot be made without the prior written approval of the Employer, and the concerned staff and other employees are obliged to remove themselves from any role in the decision and selection process, as well as any future supervision or quality control over such contracts. Staff and other employees have a duty to inform the Employer of any instances of actions that stand in contradiction to the present provisions. Such reports will be treated diligently and with due confidence.

3. Personal relationships at workplace

Staff and other employees have a duty to inform the Employer of their personal relationships at workplace, be it ongoing or previous ones, including personal relations concerning a Member of the Board. In the latter case, the Chairman of the Board should also be notified via the Employer.

In case of such present or past relationships, no supervisory or managerial relations can exist between the individuals involved, and they must play no role in respective performance evaluations. Utmost care must be given by the staff members involved to avoid actual or perceived conflicts of interest, as well as gaining undue advantage and access to information through personal relationships.

4. Gifts and personal advantages

Staff and other employees are forbidden to accept from customers, counterparties or other entities co-operating with the Employer, or from any other persons with whom the contact was made through work, gifts of significant, non-token value. Staff and other employees can only accept token-value souvenirs or advertising/information materials.

It is forbidden to take advantage of one's position, or information acquired in connection with employment by the College of Europe, to obtain one's own economic benefit or advantages, and to take actions which could give rise to suspicions of partiality or self-interest.

III. Prohibited practices

The following practices are strictly prohibited:

- A corrupt practice – the offering, giving, receiving, or soliciting, directly or indirectly, anything of value to influence improperly the actions of another party.
- A fraudulent practice – any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit or to avoid an obligation.
- A coercive practice – impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to influence improperly the actions of a party.
- A collusive practice – an arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party⁵.
- An obstructive practice – deliberately destroying, falsifying, altering or concealing evidence material to the investigation or making false statements to investigators in order to materially impede an investigation into allegations of a corrupt, fraudulent, coercive or collusive practice; and/or threatening, harassing or intimidating any party to prevent it from disclosing its knowledge of matters relevant to the investigation or from pursuing the investigation⁶.

IV. Reporting, investigating and sanctions

1. Reporting

- i) In the event a staff member, other employee or any third party becomes aware of fraud, corruption, collusion, coercion, misuse of College of Europe funds, or any other type of misconduct including breaches of the aforementioned conflict of interest clauses, s/he must bring it to the attention of the Employer.
- ii) If a staff member, other employee or any third party considers that an allegation of fraud, corruption, collusion, coercion, misuse of College of Europe funds, or any other type of misconduct, including breaches of the aforementioned conflict of interest clauses, that s/he has brought to the attention of the Employer have not been properly addressed, he or she should bring the matter to the attention of the Board via its Chair.
- iii) Such disclosure will not result in any form of retaliation or prejudice against the reporting staff member, other employee or any third party. The College of Europe will treat such retaliation as an act of misconduct.
- iv) Staff members, other employees and any third parties must not bring charges that are frivolous or malicious.

2. Investigating

A Panel will be established, on an ad hoc basis, to deal with allegations of fraud, corruption, collusion, coercion, misuse of College of Europe funds, or any other type of misconduct, brought forth by staff members, other employees or any third parties. In cases under IV.1.i, the composition of the panel will be decided by the Employer, who will normally chair its meetings. In cases under IV.1.ii, the composition of the panel will be decided by the Chairman of the Board.

⁵ <http://www.eib.org/about/documents/ifi-anti-corruption-task-force-uniform-framework.htm>

⁶ <https://www.iadb.org/en/who-we-are/transparency/sanctions-system/office-institutional-integrity>

It is recommended that the panel's membership should be set in a way to allow for its fast and efficient work, with the composition of no more than 5 members. Its members should be impartial and will be bound by strictest confidentiality rules regarding the origin and nature of the complaint, identities of the parties concerned, and the course of the investigation. The latter must be objective, equitable, thorough and rigorous.

The Panel takes decisions through a majority vote; in the case of an equal distribution of the votes, the Chair holds the casting vote.

All and any documents and information requested by the panel must be provided immediately, as per the prohibition of obstructive practices.

Staff or other employees will not, under any circumstances, suffer discrimination or retaliation as a result of information provided during the course of the investigation.

3. Sanctions

The College of Europe will apply a zero-tolerance policy wherever the investigation process determines that its staff or other employees have engaged in corrupt, fraudulent, collusive, coercive or obstructive practices, or have breached other provisions of this Code of Conduct and Conflict of Interest Guidelines. A range of disciplinary measures and sanctions will be enforced, including termination, in accordance with the Work Regulations, contractual provisions and national legislation in force. Where warranted, such cases will be referred to relevant national authorities.

Individuals subject to termination of employment and civil-law contracts for having engaged in corrupt, fraudulent, collusive, coercive or obstructive practices shall not be eligible for future contracting by College of Europe, in any capacity.

If corrupt, fraudulent, collusive, coercive or obstructive practices concern persons employed by another entity, the College of Europe will inform that entity forthwith.

The College of Europe Panel's decisions on sanctions can be appealed before the College of Europe Board within 7 days of the decision. The subsequent Board decision will exhaust the internal procedure.

STUDENT CODE OF CONDUCT

The College of Europe in Natolin is a one-of-a-kind inclusive space for personal and professional growth. Its uniqueness comes from immersing students in a world class academic and professional development program while living and working in a truly multicultural community, that follows key values and principles:

- Inclusion and respect for diversity
- Courtesy, and tolerance in mutual interactions
- Integrity, trust, and collegiality
- No tolerance for any acts of discrimination or harassment

Different manifestations of religious or philosophical origin are welcomed as part of fostering intercultural dialogue. Since the College of Europe in, Natolin is based in Poland, the academic calendar is designed considering the local holidays, cultural features, and traditions.

Students are obliged to familiarize themselves and comply with all academic regulations and internal rules concerning their stay on Natolin campus presented in this manual. Updates and communications announced during the Academic Year constitute an integral part of the rules and regulations in place.

1. Building and caring for a respectful co-living environment

- a. Students are expected to respect and care for others, be they students, staff, guests, or any other member of the community, both on and off campus, and both on and off-line.
- b. The College of Europe Natolin does not accept any form of discrimination, intolerance, or harassment among students and between students and staff - whether it be on or off campus or on-and offline.
- c. Any of the above behaviours constitute a strong fundamental breach of the values of the College of Europe in Natolin and everyone (students and staff) should feel the moral obligation and right to react, intervene and name this such as unacceptable.
- d. The College of Europe in Natolin provides the services of a Counsellor who can be contacted to discuss in depth any troubling issues in a safe and professional context. To contact the counsellor please write to counsellor1.pl@coleurope.eu. The timing and location of the session is to be agreed with the counsellor. The sessions are subject to professional confidentiality.
- e. If anyone is a subject of or witness to any form of discrimination or harassment, they may contact the Staff Confidants directly and discuss ways to proceed under the rules of the Policy Against Discrimination and Mobbing (Annexe 3). The staff members holding the roles of Confidants are announced at the beginning of every Academic Year.
- f. Students must take the utmost care not to damage College of Europe in Natolin property or the property of others. Damage caused to any property of the College of Europe in Natolin will be paid for by the person(s) responsible. Individual residents will be held responsible for any damage done to their rooms or any part of the residence hall and its equipment.
- g. Due to fire security reasons, smoking inside the College's premises, students' residences, and students' individual rooms is strictly prohibited and may result in financial fines for the person in question.
- h. Students are responsible for their personal belongings. It is recommended that no personal object is left unattended. The College of Europe in Natolin does not assume responsibility for damage or loss of personal property of residents due to theft, fire or other causes. Students are advised to purchase a personal liability insurance covering these risks.

- i. Students are asked not to eat or drink in classes and computer rooms out of respect for others and the cleaning staff.
- j. Alcohol consumption is not allowed in the following common spaces; library, halls of residences, classrooms, restaurant, (with exception to special occasions when it
- k. The possession, use or distribution of illegal drugs in the College of Europe in Natolin is strictly forbidden and can lead to expulsion from the College.
- l. Any public behaviour resulting in detrimental consequences to the College's reputation imputable due to the consumption of alcohol or illegal drugs or any other intoxicants by a student or one of his/her guests can lead to expulsion from the College.
- m. Quiet hours are to be respected by all students in the Residences; the Villas and the apartment between 10:00 p.m. and 7 a.m.
- n. Events with music or with a high number of participants may be organized in the social spaces in Retinger residence (Social area, Billiard room, and the music room) in the weekend.

2. Academic, Extracurricular Events and Professional Development Activities

- a. During classes and events, all electronic devices such as mobile phones are to be switched to the silent mode. In class, students can use personal computers and mobile phones for academic purposes only. Students are required to put these devices away if asked by the professor. Not abiding by the rules outlined above may result in expelling the student from the course, lecture, workshop, or event.
- b. In order to comply with intellectual property laws, it is forbidden to film or record audio of professors or speakers during course, lecture, workshop, event without their prior explicit consent. Not abiding by this may result in legal action.
- c. For all events such as parties, exhibitions, panels, debates, conferences, cultural presentations etc. organized by the students at the premises of the College of Europe in Natolin it is required that students inform via e-mail the Student Affairs and Professional Development Office (studentaffairs.pl@coleurope.eu) as soon as possible, but first before and prior to making any commitments towards external partners or potential participants.
- d. Students will be invited to participate in selected events which fall outside the EIS and MATA academic programs on conditions to be announced by the organizers of the event. If an event has a limited number of spaces reserved for students, students should abide by the instructions that are communicated by the relevant office.
- e. The College of Europe in Natolin occasionally organizes closed events which are out of the scope of the EIS and MATA academic programs and not available to students. Students will be informed in advance about events that fall under this category.
- f. Registration for a course or an extracurricular event implies a firm commitment to fully participate in it, withdrawal should be communicated via e-mail not less than 24 working hours before the course, event, or professional development activity.
- g. In case of two unjustified absence from Professional Development student will not be allowed to register for professional development actions.

- h. The certification of any Professional Development activity requires a minimum attendance of 75% of the hours.
- i. For all issues related to class and exam attendance, the Study Regulations and article 26 of the dispositions particulières apply.
- j. Attending a Professional Development activity is considered a justified absence from academic lectures, which gives access to the lecture recording.

3. Communication

- a. Within the framework of its academic and extracurricular programs, the College of Europe in Natolin has the right to publish photographs, audio/video recording and live streaming done by staff members of the College of Europe in Natolin or by an employed professional photographer/videographer that feature students. These materials may be used for institutional purposes as well as for promotional activities of the College of Europe in Natolin in various media including official communication channels of the College of Europe in Natolin (websites, social media, blog, publications, etc.) and other marketing channels (websites, publications, press, mass media etc.). Students who do not wish to have their image, likeness and/or voice recorded and published, must promptly inform the Communications, Marketing and Recruitment Office via e-mail at: communications.pl@coleurope.eu at the beginning of the academic year and anyway not later than by 10th September of a given year.
- b. Students can use the “Students of the College of Europe” logo that can be requested from the Communications, Marketing and Recruitment Office. The use of the official College of Europe logo, without previous consultation with the Communications, Marketing and Recruitment Office, is a serious breach of the values and regulations of the College of Europe in Natolin and thus is forbidden.
- c. Any logos created by students for student-led activities particularly if they include the “Students of the College of Europe” logo, shall be sent to the Communications, Marketing and Recruitment Office for approval, before their first usage. The office reserves its right to request changes or amendments to such logos.
- d. The creation of websites or the opening of social media profiles by students connected to their student activities at the College of Europe in Natolin, must be agreed with the Communications, Marketing and Recruitment Office and the SAPDO prior to their activation.
- e. Students may ask the Communications, Marketing and Recruitment Office to be provided with the official student email signature template.
- f. Students shall not contact any external entity or guest to participate or contribute to a student-led activities without the expressed approval of the SAPDO.
- g. If a professor, lecturer, staff member, fellow student, or any other member of the College of Europe in Natolin community, requests not to have pictures of them taken, be recorded, or otherwise quoted on websites, social media, or any other digital or printed outlets, students must abide by their request.
- h. Guest lecturers, panellists and other guests can be quoted unless they request that their presentation is kept off the record or ask to abide by the Chatham House Rule.
- i. It is forbidden to disclose personal data of students, staff, professors, and all other members of the College of Europe in Natolin community, other than that already publicly available, without their consent.

- j. It is forbidden to spread other personal information about students, staff, professors, and all other members of the College of Europe in Natolin community, which could prejudice their reputation and/or the reputation of the College of Europe in Natolin.

4. Procedure in case of non-compliance

In case of non-compliance with the above rules, if consequences of non-compliance are not expressly defined in applicable regulations, the student (s) in question shall be invited to a meeting with the SAPDO representative to address the issue. If the issue refers to any potential discrimination or harassment the rules of “The Policy of Countermeasures Against Discrimination and Mobbing” are to be applied.

If after meeting with the student(s) who’s behaviour(s) is in question, there is no clear commitment made by the student to change his or her behaviour to resolve the problem, the issue will be addressed to the Disciplinary Committee. The composition of the Committee is conveyed by the Vice-Rector. In the process of the work of the Committee the Student Representatives are duly consulted.

5. Final Provision

The College of Europe in Natolin reserves the right to change these regulations or to implement new rules as it deems necessary for the protection of the general welfare of the students.

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 ten 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 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 our 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 this small community that lives together on a 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 grounds of these values. Therefore, as a community at the College of Europe in 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 Natolin campus.
- 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 of countermeasures against discrimination and mobbing.

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, reflect the values that we aim to uphold:

- In the previous academic year (2022-2023) we had students of 33 nationalities (51% female, 49% male), the staff are from 20 nationalities (49% female, 51 % male).
- In the current academic year (2023-2024) we again have students of 33 nationalities (55% Female, 45% male), with the stable composition of staff of 20 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:

- 1) conducting an assessment of needs and supporting initiatives on equality, diversity and inclusion;
- 2) offering consultation in the field of care for equality, diversity and inclusion;
- 3) counteracting all forms of discrimination and exclusion;
- 4) 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 the facilities to allow 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.

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

4.1.1. To be continued:

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.

4.1.1.1. 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.

4.1.1.2. 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.

4.1.1.3. A meeting with the Advocate for Equality, Diversity and Inclusion with students and staff to inform them about:

- The College of Europe in Natolin holds a 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)

4.1.2. To be implemented:

- 4.1.2.1. A review session with the students and with the staff, organized by the Advocate for Equality, Diversity during the first semester to discuss their respective experience in the community during the first weeks and to address any concerns that might have surfaced.

4.1.2.2. A review session with the Heads of departments, to assess if from their perspective there are any issues regarding the upholding of these values and if so, to discuss and decide on how to approach them.

4.2. Reviewing and drawing conclusions - Natolin Consultation Days

4.2.1. To be continued:

4.2.2. 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 analyzed 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.

4.2.2. To be implemented:

4.2.2.1. A separate section will be created in the Student End of the Year Survey with a wider breadth of questions regarding the experience of students in respect of equality, diversity, and inclusion.

4.2.2.2. 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.

4.2.2.3. The Advocate will meet with respective Heads of organisational units 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.

4.2.2.4. Based on the End of the Year Student Survey, the Staff Equality Diversity and Inclusion Survey and individual meetings with Heads of organisational units, the Advocate will prepare a summary with recommendations and present them at a respective consultation meeting to the Heads of organisational units and the Vice-Rector. The decisions taken during this meeting will be then implemented by the Advocate or respective Heads of organisational units in the new academic year.

List of documents (supplementing a comprehensive approach of the College of Europe in Natolin in the field of Equality, Diversity, and Inclusion):

- Work Regulations of the College of Europe
- Code of Conduct and Conflict of Interest Guidelines
- Student Codes of Conduct
- Equality, Diversity and Inclusion Charter
- Policy Against Discrimination and Mobbing
- Erasmus+ Charter



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