



Human Resources Policies

# Harassment Policy

Prepared by HR WG  
hr@euroavia.eu

26/09/2025

## EXECUTIVE SUMMARY

EUROAVIA is committed to providing a safe environment for all its members and all persons participating in EUROAVIA activities, free from discrimination on any grounds and from harassment in the association, including sexual harassment. The purpose of this policy is to provide the framework for such a safe environment.

EUROAVIA will operate on a zero-tolerance policy for any form of harassment, whether it takes place within EUROAVIA's official premises, during its events or meetings, or outside these, including physical meetings, social gatherings, business trips organized by or on behalf of EUROAVIA International, and across any form of related social media.

EUROAVIA will therefore treat all incidents seriously and promptly investigate all allegations of harassment. This zero-tolerance policy also applies to all false accusations and actions taken with the aim of harming another person within the association or the aforementioned activities.

# Table of Contents

<b>1</b>	<b>The Harassment Policy Statement</b>	<b>4</b>
1.1	Definition of terms	5
1.1.1	Harassment	5
1.1.2	Sexual harassment	6
1.1.3	Related terms	7
<b>2</b>	<b>Election of the HR responsible</b>	<b>8</b>
<b>3</b>	<b>Complaints procedure</b>	<b>8</b>
3.1	When the HR WG receives a complaint of harassment, they will:	9
3.2	Informal complaints mechanism	9
3.3	Formal complaints mechanism	10
3.4	Specifications on suspensions and dismissals following formal complaints	10
3.5	False accusations management	11
3.6	Anonymous complaints management	11
<b>4</b>	<b>Personal data and complaints management and storage</b>	<b>12</b>
<b>5</b>	<b>Specific case for Physical International Events</b>	<b>13</b>
5.1	Before an International Event	13
5.2	During an International Event	13
<b>6</b>	<b>Hikkeli Mikkeli clause</b>	<b>13</b>

# 1 The Harassment Policy Statement

Any person found to have harassed another will face disciplinary action, up to and including exclusion from any event in the scope of EUROAVIA International. All complaints of harassment will be taken seriously and treated with respect and in confidence. No individual will face retaliation or victimization.

Local Groups are encouraged to adopt the same policy adapted to their local circumstances. An updated list of Local Groups that have adopted such a policy will be published by EUROAVIA International.

## 1.1 Definition of terms

### 1.1.1 Harassment

**Harassment** is the offensive, belittling or threatening behavior directed at an individual person or a group of people, which occurs with the purpose or effect of violating the dignity of a person and of creating an intimidating, hostile, degrading, humiliating or offensive environment. Harassment can involve one or more incidents, and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behavior that constitute harassment include, **but are not limited to**:

#### Verbal conduct

- Insults, slurs, or derogatory comments and remarks
- Yelling or abusive language
- Spreading rumors or gossip

#### Physical conduct

- Physical violence including pushing, hitting, biting or blocking someone's way
- Threatening gestures or actions
- Purposely damaging belongings

#### Psychological Harassment:

- Intimidation
- Deliberately excluding someone from meetings or team activities
- Persistent criticism without constructive feedback
- Display, production, or circulation of written words, images, or other material with offensive content

#### Non-verbal conduct

- Inappropriate gestures making lewd or offensive hand signals or facial expressions
- Accessing of private items
- Invading personal space, blocking paths, or excessive following
- Mimicking or mocking
- Threatening behavior such as displaying objects (e.g., weapons) in a menacing way

#### Discriminatory conduct

Disrespectful comments based on characteristics such as race, gender, religion, age, disability or sexual orientation

### 1.1.2 Sexual harassment

**Sexual harassment** refers specifically to **unwelcome/nonconsensual conducts of a sexual nature** which make a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person's role, as well as situations that create a hostile, intimidating or humiliating environment for the recipient.

Anyone can be a victim of sexual harassment, regardless of the sex, age and/or role of both the victim and the harasser. What matters is that the sexual conduct is unwanted and unwelcome/nonconsensual by the person against whom the conduct is directed.

Sexual harassment can involve one or more incidents, and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behavior that constitute sexual harassment include, **but are not limited to:**

#### Physical conduct

- Physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- The use of any kind of reward or extortion (including EUROAVIA related) to solicit sexual favors

#### Verbal conduct

- Comments on a person's appearance, age, private life, etc.
- Sexual comments, stories and jokes
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the person
- Condescending remarks
- Sending sexually explicit messages

#### Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering
- Sharing content of sexual character involving the victim without their consent

### 1.1.3 Related terms

**Bullying** occurs when an individual experiences persistent negative behavior, ranging from negative verbal comments to negative physical contact, which could psychologically, emotionally or physically hurt or isolate that person at the workplace. It usually involves repeated incidents, or a pattern of behavior intended to intimidate, offend, degrade or humiliate a particular person or group of people. It may also be described as the assertion of power through aggression.

**Cyber-harassment** involves the sending or posting of harmful, cruel or offensive texts or images by e-mail, internet, social media or other digital communication devices.

This includes disseminating/ leaking private information, pictures or other data without the persons consent ("doxxing").

The use of pictures in AI Tools without consent as well as altering Photos or other data about the person (e.g.: deepfakes) to change the context of that data.

**Mobbing** is a type of bullying behavior carried out by a group, rather than an individual. Mobbing is the bullying and/or social isolation of a person through collective unjustified accusations, humiliation, general harassment, or emotional abuse. Although attributed to group behavior, mobbing behavior includes instances whereby an individual within the group engages in such behavior as insulting or playing practical jokes on the victim.

**Hazing** refers to any activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers them, regardless of the participant's willingness to engage. Hazing is often associated with initiation or membership rituals in organizations or teams. Hazing can take various forms, including:

- Physical acts: Forced exercise, exposure to extreme weather, or physical abuse
- Psychological abuse: Threats, excessive criticism, or forced embarrassment
- Coercion: Demanding the consumption of alcohol or drugs or engaging in illegal activities
- Social isolation or public humiliation

EUROAVIA recognizes that sexual harassment is a manifestation of power relationships and is more likely to occur within unequal relationships in the association, for example between coordinator or board member and a regular member. Anyone, including members of EUROAVIA, collaborators, partners or sponsors will be reprimanded in accordance with this internal policy.

## 2 Election of the HR responsible

EUROAVIA will nominate "the HR responsible" among the Working Groups of the association and provide them with special guidelines to enable them to assist victims of harassment.

- HR representatives will be elected in the congress for a duration of one (1) Business Year
- Candidacies are informal, requiring only a statement of intent without the need for a motivation letter. If there are no candidates, someone will be appointed by the congress
- The HR representative(s) should be elected from among the members of the HR WG, with a minimum of six (6) months of presence in the Working Group required. It cannot be the current HR Coordinator
- A maximum of two people can be chosen in the election, with two being recommended
- Attendance of the HR representative during congresses is not required, whether for candidacy or appointment
- Representatives cannot hold this duty for more than two (2) consecutive business years
- In case the HR responsible(s) cannot perform their duty anymore, the IB and HR WG coordinator will temporarily appoint a member from within the Working Group to fill the position until the next congress meeting

## 3 Complaints procedure

Anyone who is subject to harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. They may also approach the HR-responsible and HR-coordinator at [hr.complaints@euroavia.eu](mailto:hr.complaints@euroavia.eu). If desired, they can also approach directly a member of the HR WG either in person or online.

EUROAVIA recognizes that harassment may occur in unequal relationships (i.e. between a coordinator and a member of his or her working group) and that it may not be possible for the victim to inform the alleged harasser. EUROAVIA understands the need to support victims in making complaints.

### **3.1 When the HR WG receives a complaint of harassment, they will:**

- immediately record the dates, times and facts of the incident(s)
- ascertain the views of the victim as to what outcome he/she wants
- ensure that the victim understands EUROAVIA's procedures for dealing with the complaint
- discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome
- keep a confidential record of all discussions/ proceedings
- respect the choice of the victim
- at physical International Events and projects, there will be a point of contact within the event organization for anyone who's been harassed. This person will ensure that the victim knows that he/she can make a complaint outside the organization through the relevant national/legal framework

Throughout the complaint procedure, the victim and the alleged harasser are entitled to be accompanied by a person of their choosing that is not a member of the IB. If the alleged harasser or the victim has evidence that the HR responsible may be biased, they can request a new HR responsible to manage their case.

### **3.2 Informal complaints mechanism**

If the victim wishes to deal with the matter informally, the HR responsible will:

- give an opportunity to the alleged harasser to respond to the complaint. A deadline for such a response shall be set by the designated HR WG member before proceeding. This period shall not be less than three(3) weeks or more than seven(7) weeks.
- ensure that the alleged harasser understands the complaints mechanism
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant, or refer the matter to a designated mediator within the company to resolve the matter
- follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped

### 3.3 Formal complaints mechanism

If the victim wants to make a formal complaint or if the informal complaint mechanism has not led to a satisfactory outcome for the victim, the formal complaint mechanism should be used to resolve the matter. The HR responsible will:

- interview the victim and the alleged harasser separately;
- interview other relevant third parties separately;
- produce a report detailing the investigations, findings and any recommendations;
- decide what the appropriate remedy for the victim is on account of the seriousness of the misconduct and in consultation with the victim (i.e., an apology, suspension and/or dismissal);
- follow up to ensure that the recommendations/ decisions are implemented, that the behavior has stopped, and that the victim is satisfied with the outcome;
- if it cannot be determined that the harassment took place, they may still make recommendations to ensure proper functioning in the association;
- ensure that the process is done as quickly as possible and appropriate

### 3.4 Specifications on suspensions and dismissals following formal complaints

If **suspension** is applied, a specific period of suspension will be determined in accordance with the seriousness of the actions. This suspension will be proposed by the HR responsible and approved by the IB in a meeting in which all parties shall be present. During this period, the person concerned will be excluded from all EUROAVIA International activities and the Local Group where the person concerned is registered will be contacted and encouraged to apply the same measures at local level and/or to follow its own harassment policy.

For **dismissal**, the same conditions as for suspension apply, but for an indefinite period.

In the specific case of an International Board Member being accused of sexual harassment, the same procedure must be followed as for non-IB members. However, the suspension and/or dismissal of such a member must be approved by the Congress in accordance with section 7.6 of the EUROAVIA Bylaws.

After either suspension or dismissal, the accused will be placed on an “International Events Blacklist”. This list will be managed exclusively by the HR responsible. The HR responsible will receive the list of applicants for each International Event from the respective event tutor and will crosscheck it with the “International Events Blacklist” and any applicant found on the blacklist will be rejected.

To ensure anonymity of the blacklisted people, the HR responsible will give them seven (7) days to voluntarily rescind their application in the event. Otherwise, after this period, the HR responsible will inform the organizing team of the declined participation of the person.

The safety of the victim takes priority, should the victim and the perpetrator should apply to the same International Event after the suspension period is up, and the victim will be asked if special precautions should be taken, depending on the gravity of the situation and subject to the approval of the HR responsible and HR Coordinator.

### **3.5 False accusations management**

EUROAVIA has zero tolerance towards false and malicious accusations. If, after an investigation following an accusation, the HR WG finds the accusation to be false and not the result of error but malicious intent, the person holding such an accusation will be reprimanded as if they were the harasser.

It should be noted that these considerations only apply if the HR WG can provide evidence that the accusation is false. This means that if an allegation cannot be proven to be true due to a lack of evidence, but there is no evidence that it is false either, the allegation is not considered false, only inconclusive.

### **3.6 Anonymous complaints management**

Anonymous complaints are always accepted. Under certain circumstances, it may not be possible to reach a decision or resolve the conflict. HR WG endeavors to do so and recognizes the importance of anonymity.

## 4 Personal data and complaints management and storage

All the information regarding the accusations on the harassment will be stored in an encrypted hard drive that will be in the possession of the designated HR responsible. This hard drive will be transmitted from responsible to responsible physically and the password orally. The password shall be modified every six (6) months and every time the responsible changes.

All complaints will only be managed by the HR responsible and supervised by the HR Coordinator. Once receiving the first email with the allegation, this person will create a dedicated folder within the hard drive and delete all traces of such an email to protect the confidentiality of all the parties involved. From that point on, the investigation will take place and all needed information for such an investigation will only be stored on the hard drive.

Evidence by any party shall obtain as little personal information as possible, yet enough to understand the context. Personal information such as full name, addresses, personal numbers, etc, shall be blacked out.

The data will be kept in accordance with the data protection policy.

## 5 Specific case for Physical International Events

### 5.1 Before an International Event

In case of an Investigation is still ongoing during the application period of an International Event, the application of the accused and the accuser will be put on hold until a conclusion is reached.

### 5.2 During an International Event

If an accusation, that endangers the safety of the victim is made during a Physical International Activity, EUROAVIA will provide a safe environment for the victim within the possibilities of the organizing committee of the event. Special efforts will be made to put distance between the involved parties during the rest of the event, both during the official activities of the event and the leisure and resting time (e.g., changing rooms if necessary, having a chaperon with the victim, etc.). These measures will be adapted to the needs stated by the victim.

## 6 Hikkeli Mikkeli clause

At the beginning of every EMEAC and AMEAC, the presentation of what the Hikkeli Mikkeli is shall be done. After such a presentation, all participants of the event must sign a consent form. Those people not giving their consent will be therefore excluded from the Hikkeli Mikkeli final presentation.

It shall be noted that during the ongoing of the event, this consent may be reviewed by the participants if desired and they must officially communicate the IB that they no longer wish to be part of the presentation, signing again a modified consent form.

If participants wish to be included in the Hikkeli Mikkeli presentation but prefer to exclude certain type of content, they must state this when signing the consent form. The Hikkeli Mikkeli organizing team must keep track of all these consent forms and make sure that the participants' preferences are met. If there is any doubt about whether or not to include certain content, they must make sure that the participants agree.