

East European University

Whistleblowing and Protected Disclosure Policy

Article 1. Purpose and Scope of the Policy

1. The purpose of this Policy is to strengthen ethical governance, integrity, transparency, and accountability at East European University through the establishment of a safe and reliable mechanism for reporting ethical violations.
2. This Policy establishes the principles of reporting ethical violations, protection of confidentiality, and protection against retaliation.
3. This Policy applies to the University's students, academic and administrative staff, as well as any person who has information regarding a potential ethical violation within the University.
4. This Policy does not apply to matters related to research ethics, which are regulated by separate research ethics mechanisms of the University.

Article 2. Definition of an Ethical Violation

An ethical violation may include, but is not limited to:

- a) violation of ethical conduct rules;
- b) failure to disclose or improper management of a conflict of interest;
- c) discrimination on any grounds;
- d) harassment or unethical treatment;
- e) violation of administrative or institutional ethics;
- f) any other act or omission that contradicts the University's ethical principles and internal policies.

Article 3. Right to Report and Good Faith

1. Any person has the right to report, in good faith, a potential ethical violation to the Ethics Committee.
2. A report shall be considered to be made in good faith if it is based on the reporter's genuine belief and available information, regardless of whether the violation is subsequently confirmed.
3. This Policy does not protect reports that are knowingly false or made in bad faith.

Article 4. Reporting Channels

1. A report of an ethical violation may be submitted:
 - a) via the Ethics Committee's electronic mail;

- b) through an online form published on the University's official website.
2. A report may be submitted either on a named or anonymous basis.

Article 5. Confidentiality

1. The Ethics Committee ensures the confidential consideration of all reports.
2. The identity of the reporter and related personal data shall not be disclosed, except in cases expressly provided for by law.
3. Information shall be used solely for the purpose of reviewing the report and taking appropriate action.

Article 6. Principle of Protection against Retaliation

1. Any form of retaliation against a person who, in good faith, reported a potential ethical violation to the Ethics Committee or cooperated in the review process is prohibited.
2. Retaliation includes, but is not limited to:
 - a) disciplinary pressure;
 - b) deterioration of working or study conditions;
 - c) threats, intimidation, or discriminatory treatment.
3. Retaliation constitutes an ethical violation and gives rise to appropriate disciplinary responsibility.

Article 7. General Procedure for Review of Reports

1. The Ethics Committee assesses the report within the scope of its competence.
2. Where necessary, the Committee may request additional information.
3. The review is conducted impartially, collegially, and in compliance with ethical standards.
4. As a result of the review, the Ethics Committee issues a conclusion or recommendations to the relevant University bodies.

Article 8. Education and Prevention

The University promotes the prevention of ethical violations through:

- a) ensuring accessibility of ethics policies and procedures;
- b) awareness-raising activities for students and staff;
- c) supporting the development of an ethical culture.

Article 9. Final Provisions

1. This Policy is approved by the University's Representative Council.
2. This Policy enters into force upon approval.
3. This Policy is publicly accessible on the University's official website.

