The University of Miskolc, in compliance with the provisions of Act XXV of 2023 on complaints, notifications of public interest and rules on the notification of abuse, and the provisions of Government Decree 370/2011 (XII.31.) on the internal control system and internal audit of budgetary bodies, maintains dedicated channels for receiving whistleblowing complaints of incidents that violate organisational integrity (hereinafter jointly referred to as “**whistleblowing complaints**”).

**Who can file a whistleblowing complaint?**

a) anybody in an employment relationship or in another legal relationship aimed at employment with the University of Miskolc
b) anybody whose employment relationship or previous public servant legal relationship with the University of Miskolc has ceased,
c) anybody wishing to establish an employment relationship with the University of Miskolc, for whom the procedure for the establishment of such a legal relationship has started,
d) any sole proprietor or sole trader if he has a contractual relationship with the University of Miskolc, and any member of the University's Public-Benefit Supervisory Board, the Board of Trustees of the Universitas Miskolcinenesis Foundation,
e) any contractor, subcontractor, supplier, or a person under the supervision and control of an agent who has started the procedure for establishing a contractual relationship with the University of Miskolc, is in a contractual relationship or has had a contractual relationship,
f) trainees and volunteers employed by the University of Miskolc,
g) anybody in respect of whom the procedure for the establishment of a legal or contractual relationship within the meaning of point (d), point (e) or point (f) has started,
h) anybody whose legal relationship or contractual relationship with the University of Miskolc as referred to in point (d), (e) or (f) has been terminated,
i) anybody in a student legal status with the University of Miskolc,
j) anybody who has substantial information about the existence or potential existence of an event in breach of integrity.

**What can be reported in the whistleblowing complaint?**

The whistleblowing line can be used to report:

* any information about an unlawful or suspected unlawful act or omission or other misconduct;
* any event that deviates from the rules applicable to the University of Miskolc and from the operation in accordance with the organisational objectives, values and principles set by the Senate, senior management, management and the Board of Trustees of the Universitas Miskolcinenesis Foundation, within the constraints of the law.

**How to make a whistleblowing complaint?**

a) orally, in person, in Office No. 128 on the 1st floor of Building A/4, 3515 Miskolc, Egyetemváros, from Monday to Thursday between 9.00 and 15.00,
b) in writing,
ba) by e-mail sent to the e-mail address **bejelentes-compliance@uni-miskolc.hu**
bb) by mail sent to the address: 3515 Miskolc, Egyetemváros Pf.: 1.,
bc) by placing it in the letter box to be found in front of Office No. 128 on the first floor of Building A/4, 3515 Miskolc, Egyetemváros.

If submitted by post, the envelope must be clearly marked **‘Compliance whistleblowing complaint’**, so that only the authorised person can get acquainted with it.

To assist you in making a written whistleblowing complaint, you can download the separate [Whistleblowing complaint form](https://www.uni-miskolc.hu/wp-content/uploads/2024/05/bejelento_adatlap.docx), the use of which is recommended but not mandatory.

If you do not use the above whistleblowing complaint form, please include the following information in your whistleblowing complaint (whether written or oral) to help facilitate an effective investigation:

* Whistleblower’s particulars (name, residential address/postal address, telephone number, e-mail address);
* • Description of the reported incident (when, why, how the incident occurred);
* • Who was involved in the incident? (either on the perpetrator’s or victim’s side);
* • How did you find out about the incident?
* • What evidence do you have to support the above?

**What happens after the whistleblowing complaint has been received?**

The Compliance Officer of the University of Miskolc will send the whistleblower confirmation of receiving the whistleblowing complaint within seven days of receipt thereof, and provide information on the procedural and data processing rules therein.
The Compliance Officer will investigate the allegations in the whistleblowing complaint as soon as the circumstances permit, but no later than 30 days after receipt of the whistleblowing complaint. This deadline may be extended in particularly justified cases upon simultaneously informing the whistleblower. The information shall specify the expected date of the investigation and the reasons for the extension.
The Compliance Officer shall investigate the whistleblowing complaint within 3 months even in the case of an extension.
The Compliance Officer of the University of Miskolc shall inform the whistleblower in writing about the investigation of the whistleblowing complaint, the reasons for the possible lack of an investigation, the result of the investigation of the whistleblowing complaint, the measures taken or planned.
During the investigation of the whistleblowing complaint, the Compliance Officer shall keep in contact with the whistleblower and may invite him to supplement or complete the whistleblowing complaint, to clarify the facts of the case and to provide additional information.

**Data Processing Guide**

The University of Miskolc has issued a Data Processing Guide on the processing and protection of personal data in connection with the investigation of incidents that violate integrity entitled “**Data processing guide for natural persons reporting incidents that violate integrity to the University of Miskolc”**, which [is publicly available on the University of Miskolc website](https://www.uni-miskolc.hu/wp-content/uploads/2024/05/ise_adatvedelmi_tajekoztato.pdf) ([www.uni-miskolc.hu](http://www.uni-miskolc.hu)).

**Protection of whistleblowers**

Whistleblowers are entitled to protection in accordance with applicable law in relation to their whistleblowing complaints made lawfully.
In the context of this protection, any measure adversely affecting the whistleblower which is taken as a result of the whistleblowing complaint made lawfully and which is taken in the context of the legal relationship or connection giving rise to the right to make a whistleblowing complaint, is deemed unlawful even if it would otherwise be lawful.
Where a whistleblowing complaint is lawfully made, the whistleblower shall not be deemed to have breached any restriction on disclosure of a legally protected secret or any other legal restriction on disclosure of information and shall not be liable in respect of such disclosure, **provided that the whistleblower had reasonable grounds for believing that disclosure was necessary to reveal the circumstances of which the disclosure was made.**
Where a whistleblowing complaint has been made lawfully, the whistleblower shall not be liable for obtaining or having access to the information contained in the whistleblowing complaint, unless the whistleblower has committed a criminal act by obtaining or having access to the information.
A whistleblower shall not be held liable for lawfully making a complaint if the whistleblower had reasonable grounds to believe that the complaint was necessary to disclose the circumstances to which the whistleblowing relates.

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30 September 2023

Compiled by:
the Legal and Compliance Centre, University of Miskolc