Pannon Egyetem

University of Pannonia

THE COMPLAINT MANAGEMENT POLICY OF THE UNIVERSITY OF PANNONIA

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The ***COMPLAINT MANAGEMENT POLICY OF THE UNIVERSITY OF PANNONIA*** *(hereinafter referred to as: "**Policy**") issued by the University of Pannonia (hereinafter referred to as: "**University**") on the basis of the University's Organisational and Operational Rules (hereinafter referred to as: "**OOR**"), Part I Organisational and Operational Rules of Procedure (hereinafter referred to as: "**OORP**") approved by the Senate of the University of Pannonia and adopted by the Foundation for the University of Pannonia acting as the operator exercising founders' and ownership rights (hereinafter referred to as: "**Operator**") and on the basis of the resolution by the Board of Trustees on the rules of procedure for adopting the regulations of the University of Pannonia by the Board of Trustees is as follows.*

Chapter I

INTRODUCTORY PROVISIONS

1.§ Aim of the Policy

(1) The aim of this Policy is to determine the transparent, efficient, legally compliant, non-discriminatory, equal and non-discriminatory handling of reports and notifications related to the activities and operations of the University.

2.§ Scope of the Policy

(2) The personal scope of this Policy shall extend to all the employees of the University.
(3) The personal scope of Chapters I-III, V, VII and VIII of this Policy shall extend to thestudents of the University as well.
(4) The personal scope of Chapter IV of this Policy shall extend to natural or legal persons who have, have had or will have any legal relationship with the University, in accordance with the provisions of Act XXV of 2023 on Complaints, Notifications of Public Interest and the Rules for Whistleblowing, and to persons who have a management or supervisory relationship with the University.
(5) The material scope of this Policy shall extend to reports and whistleblower reports submitted by persons subject to the personal scope of this Policy and the investigation of such reports.

3.§ Legal background, regulatory environment

(1) The University of Pannonia has established its complaint management system on the basis of the following legal provisions:

– Act V of 2013 on the Civil Code,
– Act XXV of 2023 on Complaints, Notifications of Public Interest and the Rules for Whistleblowing (hereinafter referred to as: "Complaints Act"),

- Act CXXXV of 2020 on Services and Support Facilitating Employment and on the Supervision of Employment,
- Act LXXX of 2003 on Legal Aid,
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information,
- the Code of Ethics, the Student Requirement System (hereinafter referred to as: "SRS"), the Employment Requirement System (hereinafter referred to as: "ERS") and the Policy on Equal Opportunities of the University of Pannonia.

4.§ Definitions

(1) Report: an oral or written communication of a complaint or information suspected of being a complaint or internal abuse made by a reporter in person, by telephone or through an online system established for this purpose, in accordance with this Policy.
(2) Reporter: the person who submits a Report to the Complaint Management System.
(3) Person concerned by a Report: the natural or legal person in respect of whom the Report contains information that is alleged to constitute a complaint or abuse.
(4) Employment relationship: any legal relationship in which an employee performs activities for and under the direction of the University for remuneration.
(5) Employer: a person or entity that employs a natural person within the framework of an employment relationship. For the purposes of this Policy, it is the University.
(6) Employee: a natural person who performs an activity for and under the direction of the Employer within the framework of an employment relationship for remuneration.
(7) Student: a natural person who has a student or doctoral student status with the University.
(8) Complaint: any remark or complaint against the University's activities, services, employees or students, in which the Reporter raises objections against the University's actions and makes a specific and unambiguous claim in relation thereto, with the intention to remedy a harm to individual rights or interests, where such remedy is not subject to any other procedure, in particular judicial or administrative proceedings or other University regulations or procedures.
(9) Complaint Management Officer: an administrator who is responsible for keeping in touch with the Complainant.
(10) Complaint Form: the document used to make a Complaint.
(11) Complaint Management System: a system established and operated by the University for making, forwarding and investigating a report and communicating the outcome of the investigation.

(12) Whistleblowing: an oral or written communication containing information about an unlawful or suspected unlawful act or omission or other abuse.

Chapter II

GENERAL RULES

5.§ Complaint Management System, principles

(1) The University shall operate a Complaint Management System to increase the satisfaction of persons having a legal relationship with it.
(2) Reports may be submitted to the Complaint Management System in person, by telephone or online via the University's website, through its complaints reporting interface.
(3) A Complaint shall not be deemed to be a Complaint if the Reporter requests general information, an opinion or a position.
(4) In the course of the complaint management process, the University shall act with due diligence, in compliance with the obligations prescribed by the applicable laws and University regulations.
(5) The data obtained in the course of the Report and the complaint management process shall be handled in accordance with the applicable data protection regulations and shall be used solely for the purposes of the procedure and records relating to the complaint in question.
(6) Reports and Reporters shall be treated objectively, without any discrimination,
(7) equally and within the same procedural framework.
(8) Reporters shall be familiar with this Policy and the related documents and, if the allegation they make is untrue, with the consequences thereof.
(9) A Reporter shall not suffer any prejudice as a result of the fact of submitting a Report.
(10) In the assessment of the submitted Reports, an independent and impartial procedure shall be ensured and decisions shall be taken fairly and transparently.

6.§ Types of Reports

(1) This Policy makes a clear distinction between the process for handling Reports submitted by students, employees and persons in another type of legal relationship and the process for managing whistleblowing reports, the procedure for which is set out in Chapter IV.
(2) The organisational units responsible for the coordination of tasks related to Reports:

a) for student complaints: Centre for Student Services and Career (hereinafter referred to as "CSSC"),
b) for complaints submitted by employees and persons in another type of legal relationship: Quality Development Group of the Center of Excellence (hereinafter referred to as "QDG"),
c) for whistleblowing: Directorate of Legal Affairs and Procurement (hereinafter referred to as "DLAP").

(3) Collective Reports may also be submitted, but in this case the representative of the group with whom the University will keep in touch and who will be responsible for contacting the parties concerned by the Report shall be designated. In such cases, any reference in this Policy to "Complainant" shall be construed as referring to more than one person.

(4) The University may treat the submitters of a collective Report separately if it considers that the issues raised affect the various Reporters to a different extent or if the Reporters are seeking different solutions.

7.§ Role and composition of the Complaint Management Forum

(1) The Complaint Management Forum shall decide on the classification of the submitted Reports.
(2) If the Complaint Management Forum determines that the submitted Report is a Whistleblowing Report, it shall immediately forward it to the whistleblower protection lawyer, while informing the Reporter.
(3) If the Complaint Management Forum determines that the submitted Report is not covered by this Policy but by the ERS, the SRS, the Code of Ethics, the Equal Opportunities Policy or other regulation, the Complaint Management Officer shall inform the Reporter in writing within 5 working days and, if the Reporter consents to it, shall forward the Report to:
   a) the head of the organisational unit, the Director of the Directorate of Human Resources Management, the Chancellor or the Rector in accordance with the ERS;
   b) the Committee competent under the ERS or, in the case of different rules of procedure, information is sent on the method of submission;
   c) the Ethics Committee;
   d) the Equal Opportunities Committee;
   e) in any other case, to the competent person (e.g. in the case of a serious act or omission prejudicial to the interests or the general perception of the University, the Rector and the Chancellor may order an investigation of the Report, where the suspicion of a criminal offence entails an obligation to report to the competent authorities).

(4) If the Complaint Management Forum determines that the Report is not covered by Sections (2) and (3) of Article 7, the Complaint shall be investigated and adjudicated by the Complaint Management Forum.

(5) Composition of the Complaint Management Forum, conflicts of interest:

a) In matters relating to employees and other persons having a different legal relationship with the University, the Complaint Management Forum consists of the heads of the QDG, the DLAP and the Directorate of Human Resources Management or a group of three persons delegated by them.
b) In matters relating to students, the composition of the Complaint Management Forum: the heads of the QDG, the DLAP, the CSSC, the SUUP or the DSUUP or a group of four persons delegated by them.
c) If the Report concerns a decision made by another committee of the University, any person who participated in the investigation of the previous case related to the Report as a member of that committee may not participate in the assessment of the Report as a member of the Complaint Management Forum.

8.§ General rules of procedure

(1) The Report shall be submitted as soon as possible, but not later than 6 months after the problem arises.
(2) If the nature/type of the Report cannot be identified, the Complaint Management Officer may request further information or evidence from the Reporter regarding the details of the Report. The time period for collecting information from the Reporter shall not count towards the 5 working days given as the time limit for notification.
(3) The Complaint Management Officer shall forward the new information to the Complaint Management Forum.
(4) The investigation of a Report may be waived if
a) the Report was submitted by an unidentified Reporter (an unidentified Reporter is one where there is insufficient information available about the identity of the Reporter, despite reasonable efforts to identify him or her);
b) the Report was not submitted by a person entitled to submit a Report as defined in this Policy;
c) the Report is a repeat Report by the same Reporter with the same content as the previous one; or
d) the Report was submitted by the Reporter six months after the date on which the Reporter became aware of the act or omission complained of;

e) the harm to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the person concerned by the Report resulting from the investigation of the Report.

(5) In the case of a Report falling within the scope of this Policy, the Complaint Management Forum shall investigate the Report identified on the basis of the complaint typology (hereinafter referred to as the Complaint).

(6) Where the Complaint justifies, the Complaint Management Forum may initiate the involvement of other persons or groups in the investigation and may request to hear the person having information in relation to the Complaint or request further information or documents from the Complainant or other Persons concerned. Where there is no reason to request new information within the time period available for the investigation of the Complaint or where the request for information fails, the Complaint Management Forum shall take a decision on the basis of the data and information available to it.

(7) The Complaint Management Forum shall investigate the Complaint within 20 working days of receipt of the Complaint. This time limit may be extended once by 20 working days in duly justified cases. The Complainant shall be informed of this at the same time.

(8) If the Complaint is found to be justified, a proposal shall be made to resolve the situation complained of, which shall require action to be taken by the competent person(s). The Complaint Management Officer shall notify the Complainant and the person concerned in writing of the proposal, by means of a decision signed by the members of the Complaint Management Forum.

Chapter III

SPECIAL RULES

9.§ Reports submitted by an employee

(1) Employees who have a valid employment relationship with the University may submit a Report to the University's Complaint Management System.

(2) If the Complaint is made in person or by telephone, the Complainant shall visit the office (QDG) published on the main University website under the Complaint handling menu or call the telephone number dedicated to reporting complaints. Verbal Reports will be recorded in the Complaint Form by the staff member responsible for complaint management (hereinafter referred to as the “Employee Complaint Management Officer”) after the Privacy Notice available online under the menu used for reporting complaints has been explained. The Employee Complaint Management Officer shall provide a duplicate hard copy of the

Complaint Form to the Reporter, with the opportunity for verification, correction and acceptance of the Report by signature.

(3) In the case of a Report submitted in person or by telephone, the Employee Complaint Management Officer shall draw the attention of the Reporter to the consequences of submitting a Report in bad faith, the procedural rules governing the investigation of the Report and the fact that the identity of the Reporter –after the information necessary to establish it has been provided – will be kept confidential at all stages of the investigation of the Report.

(4) The Reporter shall provide his or her contact details to the Employee Complaint Management Officer, who shall inform the Reporter of the progress of the case during the investigation of the Report.

(5) Employee Reports can be submitted in electronic form via the online interface on the University's website. The employee Report can be submitted by clicking on the “I am an employee of the University” button after accepting the Privacy Notice associated with the Report and reading the Complaint Management Policy.

(6) The Report shall contain the alleged or suspected infringement of a right or interest, the names of the persons or entities complained of, a detailed description of the case and all relevant material information about the case, as well as a statement by the Reporter, stating that the Report is submitted in good faith in connection with circumstances of which he or she has knowledge or reasonable grounds to believe that they are true.

(7) The assessment of the Report shall be carried out in accordance with the general rules set out in Article 8.

10.§ Reports submitted by persons who has a legal relationship with the University other than an employment relationship

(1) A Report may be submitted to the University's Complaint Management System by a person having a legal relationship other than an employment relationship:

a) an Employee whose employment relationship with the University has been terminated;

b) a person who wishes to establish an employment relationship with the University and for whom the procedure for establishing such a relationship has commenced;

c) a self-employed person or a sole proprietorship, if they have a contractual relationship with the University;

d) a person who holds an equity interest in the University and any person who is a member of the University's management or supervisory body;

e) a person under the supervision and control of a contractor, subcontractor, supplier or individual who has commenced a procedure for entering into a

contractual relationship with the University or who is or has been in a contractual relationship with the University;

f) a person who holds an ownership interest in the employer and a member of the administrative, management or supervisory body of the employer, including a non-executive member;
g) trainees and volunteers working for the University;
h) a person who wishes to enter into a legal or contractual relationship with the University as referred to in paragraph c), d) or g) above and in respect of whom the procedure for the establishment of such a legal or contractual relationship has already been initiated; and
i) a person whose legal or contractual relationship with the University within the meaning of paragraph c), d) or g) above has been terminated.

(2) In the case of Reports submitted in person or by telephone, the procedure is the same as for Sections (2), (3) and (4) of Article 9.
(3) Electronic Reports can be submitted via the online interface on the University's website. The Report can be submitted by clicking on the "I have a legal relationship with the University other than an employment relationship" button after accepting the Privacy Notice associated with the Report and reading the Complaint Management Policy.
(4) The Reporter shall provide his or her contact details to the Employee Complaint Management Officer, who shall inform the Reporter of the progress of the case during the investigation of the Complaint.
(5) The Report shall contain the alleged or suspected infringement of a right or interest, the names of the persons or entities complained of, a detailed description of the case and all relevant material information about the case, as well as a statement by the Reporter, stating that the Report is submitted in good faith in connection with circumstances of which he or she has knowledge or reasonable grounds to believe that they are true.
(6) The assessment of the Report shall be carried out in accordance with the general rules set out in Article 8.

11.§ Reports submitted by persons with a student status

(1) A Report may be submitted to the University's Complaint Management System by a person having an active student status with the University.
(2) If the Report is submitted in person or by telephone, the Reporter shall visit the office (CSSC) published on the main University website under the Complaint handling menu or call the telephone number dedicated to reporting complaints. Verbal Reports will be recorded in the Complaint Form by Student Complaint Management Officer after the Privacy Notice available online under the menu

used for reporting complaints has been explained. The Student Complaint Management Officer shall provide a duplicate hard copy of the Complaint Form to the Reporter, with the opportunity for verification, correction and acceptance of the Report by signature.

(3) In the case of a Report submitted in person or by telephone, the Student Complaint Management Officer shall draw the attention of the Reporter to the consequences of submitting a Report in bad faith, the procedural rules governing the investigation of the Report and the fact that the identity of the Reporter –after the information necessary to establish it has been provided – will be kept confidential at all stages of the investigation of the Report.

(4) The Reporter shall provide his or her contact details to the Student Complaint Management Officer, who shall inform the Reporter of the progress of the case during the investigation of the Report.

(5) Electronic Reports can be submitted via the online interface on the University's website. The Employee Report can be submitted by clicking on the "I am an employee of the University" button after accepting the Privacy Notice associated with the Report and reading the Complaint Management Policy.

(6) The Report shall contain the alleged or suspected infringement of a right or interest, the names of the persons or entities complained of, a detailed description of the case and all relevant material information about the case, as well as a statement by the Reporter, stating that the Report is submitted in good faith in connection with circumstances of which he or she has knowledge or reasonable grounds to believe that they are true.

(7) The assessment of the Report shall be carried out in accordance with the general rules set out in Article 8.

(8) In the case of students, the University accepts the submission of a complaint by a third party acting as the authorised representative of the Reporter, i.e. the Students' Union (hereinafter referred to as the "SUUP") or, in the case of doctoral students, the Doctoral Students' Union (hereinafter referred to as the "DSUUP"). In such a case, the University will communicate only with the authorised representative.

Any reference in the Policy to the Reporter shall also apply to the Reporter's authorised representative.

(9) As set out above, the SUUP/DSUUP and the Complainant shall enter into a written agreement that the designated representative of the SUUP/DSUUP may act on behalf of the Complainant. A detailed Complaint Record will be drawn up and a Complaint Form will be submitted by the representative of the SUUP/DSUUP to the CSSC.

Chapter IV

WHISTLEBLOWING

12.§ The Whistleblowing system

(1) Whistleblowing is possible through the Complaint Management System on the website of the University of Pannonia or by contacting the whistleblower protection lawyer appointed by the University.
(2) The contact details of the whistleblower protection lawyer can be found on the University's website in a separate menu item, under About the University\Basic documents and public data.
(3) If Whistleblowing is done through the Complaint Management System, the Complaint Management Forum will forward the report to the whistleblower protection lawyer and inform the Whistleblower of this.
(4) If the Whistleblowing is about a chief executive (Rector or Chancellor), it can only be submitted to the whistleblower protection lawyer.
(5) Whistleblowing can be done by:
   a) Employees of the University;
   b) an Employee whose employment relationship with the University has been terminated;
   c) a person who wishes to establish an employment relationship with the University and for whom the procedure for establishing such a relationship has commenced;
   d) a self-employed person, a sole proprietorship or a student, if they have a contractual relationship with the University;
   e) a person who holds an equity interest in the University and any person who is a member of the University's management or supervisory body;
   f) a person or student under the supervision and control of a contractor, subcontractor, supplier or agent who has commenced a procedure for entering into a contractual relationship with the University or who is or has been in a contractual relationship with the University;
   g) trainees and volunteers working for the University;
   h) a person who wishes to enter into a legal or contractual relationship with the University as referred to in paragraph d), e) or g) above and in respect of whom the procedure for the establishment of such a legal or contractual relationship has already been initiated; and
   i) a person whose legal or contractual relationship with the University within the meaning of paragraph d), e) or g) above has been terminated.

13.§ Ways of Whistleblowing

(1) A Whistleblower Report may be submitted through the Complaint Management System or verbally or by e-mail to the whistleblower protection lawyer. An oral Whistleblower Report may be made by telephone or in person. A Whistleblower Report may be made in person by appointment with the whistleblower protection lawyer during business hours on working days. If the Whistleblower does not consent to the processing of his or her personal data, he or she may only make the Report in person to the whistleblower protection lawyer.

(2) The lawyer shall inform the University of any Reports directly made to the whistleblower protection lawyer or, if the Report concerns a chief executive (Rector or Chancellor), the lawyer shall inform the operator.

(3) The whistleblower protection lawyer shall record in writing any oral Whistleblower Report received by telephone and, after providing the opportunity for verification, correction and acceptance of the Report by signature, shall provide the Whistleblower with a duplicate copy thereof.

(4) If the Whistleblower makes the Report in person to the whistleblower protection lawyer, the whistleblower protection lawyer, after providing information required pursuant to the provisions on the protection of personal data, shall
   a) record it in a durable and retrievable form; or
   b) record it in writing and, after providing the opportunity for verification, correction and acceptance of the Report by signature, shall provide the Whistleblower with a duplicate copy thereof.

(5) The whistleblower protection lawyer shall make a complete and accurate record of the oral Whistleblower Report in writing.

(6) In the case of an oral Whistleblower Report, the whistleblower protection lawyer shall draw the attention of the Whistleblower to the consequences of reporting in bad faith, the procedural rules governing the investigation of the Whistleblower Report and the fact that the identity of the Whistleblower – after the information necessary to establish it has been provided – will be kept confidential at all stages of the investigation of the Whistleblower Report.

(7) In the case of a written Whistleblower Report, an acknowledgement will be sent electronically within 7 (seven) days of receipt. The acknowledgement shall include general information to the Whistleblower on the procedural and data processing rules.

(8) In the case of an anonymous Report, the Whistleblower may be asked to provide his or her name if this is essential for an effective investigation of the Whistleblower Report and the Whistleblower's contact details are available. If the Whistleblower Report is made by an unidentified Whistleblower, the investigation of the Whistleblower Report may be waived.

(9) A Whistleblower Report shall contain the alleged or suspected infringement of a right, the names of the persons or entities complained of, a detailed description of the case and all relevant material information about the case, as well as a statement by the Whistleblower, stating that the Whistleblower Report is submitted in good faith in connection with circumstances of which he or she has knowledge or reasonable grounds to believe that they are true.

(10) The whistleblower protection lawyer shall forward the Whistleblower Report to the University's Department of Legal Affairs and Procurement for information purposes, at the same time as the acknowledgment is sent to the Whistleblower, by sending an extract of the Whistleblower Report containing no data that would allow the identification of the Whistleblower, unless the Whistleblower has given his or her prior written consent to the transfer of his or her personal data.

14.§ Investigation of the Whistleblower Report

(1) The whistleblower protection lawyer shall investigate the allegations contained in the Whistleblower Report received by him or her as soon as possible, but not later than thirty (30) days from the date of receipt of the Whistleblower Report. This time limit may be extended in particularly justified cases, with simultaneous notification sent to the Whistleblower. In such a case, the Whistleblower shall be informed of the expected date of the investigation and the reasons for the extension of the investigation in a short e-mail. Not even in the case of an extension may the time limit for the investigation of a Whistleblower Report and for informing the Whistleblower exceed 3 (three) months.

(2) During the investigation of the Whistleblower Report, the whistleblower protection lawyer shall keep in touch with both the Whistleblower and the University, in the course of which he or she may ask the Whistleblower and the University to supplement or explain the Whistleblower Report, to clarify the facts of the case and to provide additional information.

(3) The investigation of a Whistleblower Report may be waived if

a) The Whistleblower Report is made by an unidentified Whistleblower (a Whistleblower is considered to be unidentified if the whistleblower protection lawyer does not have sufficient information about the identity of the Whistleblower, despite reasonable efforts to discover it);
b) The Whistleblower Report was not submitted by a person authorised to do so;
c) The Whistleblower Report is a repeat Whistleblower Report made by the same Whistleblower with the same content as the previous Whistleblower Report; or
d) The harm to the public interest or to an overriding private interest would not be proportionate to the restriction of the rights of the person concerned by the

Whistleblower Report resulting from the investigation of the Whistleblower Report.

(4) Where the investigation of a Whistleblower Report may be waived pursuant to Section (4) of Article 8 of this Policy, the whistleblower protection lawyer shall perform the tasks related to the receipt and filing of the Whistleblower Report and the provision of information related to the Whistleblower Report before the waiver can be made.

(5) The investigation of a Whistleblower Report shall include an assessment of the relevance of the circumstances set out in the Whistleblower Report and appropriate measures to remedy the acts or omissions or other abuses that are or are suspected to be unlawful shall be taken.

(6) If the content of a Whistleblower Report justifies the initiation of criminal proceedings, the whistleblower protection lawyer shall arrange for the filing of a criminal complaint.

(7) The whistleblower protection lawyer shall inform the Whistleblower in writing of the investigation or non-investigation of the Whistleblower Report and the reasons for the non-investigation, the outcome of the investigation of the Whistleblower Report and the measures taken or planned. The provision of written information may be waived only if the whistleblower protection lawyer has orally informed the Whistleblower, who has expressly acknowledged the information in a verifiable manner.

(8) The whistleblower protection lawyer shall provide clear and easily accessible information regarding the operation of the Whistleblower Reporting System, the Whistleblower Reporting process as well as the Whistleblower Reporting systems and procedures.

Chapter V

DATA PROCESSING

15.§ Rules for data processing in connection with the Report

(1) Within the framework of the Complaints Handling System, the personal data of
   a) the Reporter,
   b) the person whose conduct or omission gave rise to the Report; and
   c) the person who may have information of substance concerning the matter stated in the Report essential to the investigation of the Report may be processed only for the purpose of investigating the Report and remedying or putting an end to the conduct that is complained of in the Report and may be forwarded to the whistleblower protection lawyer or to an external organisation.

(2) Personal data not covered by Section (1) of Article 15 shall be deleted without delay from the data processed within the framework of the Complaint Management System.

(3) Where the Report concerns a natural person, in the exercise of the right of information and access of that natural person under the provisions on the protection of personal data, the personal data of the Reporter shall not be disclosed to the person requesting the information.

(4) Persons involved in the investigation of a Report may, until the investigation is closed or formal charges are initiated as a result of the investigation, share information on the content of the Report and the person concerned by the Report – in addition to informing the person concerned by the Report – with an employee of the University to the extent necessary for the conduct of the investigation, and may request information from the employee to the extent necessary for the conduct of the investigation.

(5) The personal data of the Reporter, with the exception of the data of the Reporter who has provided obviously false data or information in bad faith, may be disclosed only to the government body or authority competent to conduct the proceedings initiated on the basis of the Report, if such government body or authority is entitled to process the data by law or if the Reporter has consented to the disclosure of his or her data. The personal data of the Reporter shall not be disclosed without his or her explicit consent.

(6) If it has become apparent that the Reporter has, in bad faith, provided false data or information and
   a) in this context, if there are indications that a criminal offence or infraction has been committed, the personal data of the Reporter shall be disclosed to the government body, authority or person entitled to conduct the proceedings,

b) there are reasonable grounds for believing that he or she has caused unlawful damage or other legal harm to another person, his or her personal data shall be disclosed at the request of the government body, authority or person entitled to initiate or conduct the proceedings.

(7) The transfer of data processed within the framework of the Complaint Management System to a third country or an international organisation may only take place in the case of a legal commitment by the recipient of the transfer to comply with the provisions set out in the Complaints Act on Reports and subject to the provisions on the protection of personal data.

(8) The person concerned by the Report and any person who may have information relevant to the facts contained in the Report shall be informed in detail of the Report, of his or her rights regarding the protection of his or her personal data and of the rules on the processing of his or her data when the investigation is opened. In accordance with the requirements of a fair hearing, it shall be ensured that the person concerned by a Report or the person having material information about the facts contained in a Report can express their standpoint on the Report through their legal representative and that they can provide evidence in support of their standpoint. In exceptional and duly justified cases, the person concerned by the Report or the person who has factual knowledge of the matters contained in the Report may be informed at a later stage, if immediate information would impede the investigation of the Report.

Chapter VI

WHISTLEBLOWER PROTECTION

16.§ The protection of Whistleblowers

(1) Any action adversely affecting the Whistleblower,

a) which is taken as a result of the lawful submission of a Whistleblower Report; and

b) which is implemented in connection with a legal relationship or connection as defined in Section (1) of Article 9, Section (1) of Article 10 and Section (1) of Article 11, shall be considered unlawful even if it would otherwise be lawful.

(2) Adverse action means an act or omission which is detrimental to the Whistleblower, in particular

a) suspension, collective redundancies, dismissal or equivalent measures;

b) delegation of duties, change of place of work, reduction of wages, change of working hours;

c) refusal to take part in trainings;

d) negative performance assessment;

e) the application of any adverse legal consequence applicable under the law to the employment relationship, in particular disciplinary measures, reprimands or financial penalties;
f) coercion, intimidation, harassment or ostracism;
g) discrimination, unfavourable or unfair treatment;
h) failure to convert a fixed-term employment relationship into an employment relationship of indefinite duration, if the Employee had a legitimate expectation that his or her employment relationship would be converted into an employment relationship of indefinite duration;
i) failure to renew or early termination of a fixed-term employment contract;
j) damage, which includes damage to a person's reputation or financial loss, including loss of business opportunity and loss of income;
k) a measure as a result of which it is reasonable to conclude that the person concerned will not be able to take up future employment in the sector in which he or she is employed;
l) the requirement to undergo a medical fitness test;
m) early termination or cancellation of a contract for the supply of goods or services; and
n) the withdrawal of the authorisation.

(3) In the course of official or judicial proceedings in connection with an adverse action pursuant to Section (2) of Article 16, if the Whistleblower proves that the Whistleblower Report was lawfully made –
a) the adverse action shall be presumed to have been taken as a result of the lawful making of the Whistleblower Report; and
b) the person who took the adverse action shall bear the burden of proving that the adverse action was taken for a valid reason and not because of the lawful making of a Whistleblower Report.

(4) Where a Whistleblower Report has been 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 a Whistleblower Report if the Whistleblower had reasonable grounds to believe that the Whistleblower Report was necessary to disclose the circumstances to which the Whistleblower Report relates.

(5) Where a Whistleblower Report has been lawfully made, the Whistleblower shall not be liable for obtaining or accessing the information contained in the Whistleblower Report, unless the Whistleblower has committed a criminal offence by obtaining or accessing the information. A Whistleblower shall not be held liable for lawfully making a Whistleblower Report if the Whistleblower had reasonable grounds to believe that the Whistleblower Report was necessary to disclose the circumstances to which the Whistleblower Report relates. The

Whistleblower may invoke the provisions of Sections (4) to (5) of Article 16 in all official or judicial proceedings, in addition to proving that the Whistleblower Report was lawfully made.

(6) A Whistleblower Report is lawfully made if
   a) the Whistleblower has submitted the Whistleblower Report to the Complaint Management System in accordance with the rules set out in this Policy and the Complaints Act;
   b) the Whistleblower obtained the reported information concerning the circumstances to which the Whistleblower Report relates in the context of his or her employment-related activities; and
   c) the Whistleblower had reasonable grounds to believe that the information reported concerning the circumstances to which the Whistleblower Report relates was true at the time the Whistleblower Report was made.

(7) Anybody who makes a lawful Whistleblower Report without revealing his or her identity – in particular without providing his or her name and personal data necessary for his or her identification – and, following his or her subsequent identification, and suffers an adverse action referred to in Section (1) of Article 16 or any of the measures listed in Section (2), shall enjoy the protection that Whistleblowers enjoy.

(8) The protection that Whistleblowers enjoy shall be applied also to a person:
   a) who assist the Whistleblower making a lawful Whistleblower Report in submitting the Whistleblower Report,
   b) who is related to the Whistleblower making a lawful Whistleblower Report, in particular a colleague or family member of the Whistleblower, who may be subject to adverse action under Section (2) of Article 16 of Chapter VI.

(9) The protection under Article 16 shall not apply to the Whistleblower if
   a) he or she breaches the law on classified information by making a Whistleblower Report,
   b) when making a Whistleblower Report, he or she fails to comply with the confidentiality obligations imposed by law in relation to medical confidentiality and legal professional privilege,
   c) in making a Whistleblower Report, the Whistleblower being a church person or a member of a religious association performing religious services in a professional capacity fails to comply with his or her professional duty of confidentiality,
   d) in making a Whistleblower Report, he or she violates the rules on the protection of secrets protected by law in connection with judicial proceedings,
   e) he or she is in breach of the rules on data processing under the rules of criminal procedure by making a Whistleblower Report; or

f) as a member of law enforcement, the Military National Security Service or the National Tax and Customs Administration, he or she violates the rules applicable to the activities of these bodies by making a Whistleblower Report.

Chapter VII

MONITORING

17.§ Monitoring

(1) The QDG shall keep a record of the number of Reports received, the time taken to process them and the types of complaint determined on the basis of the complaint typology, and shall report annually to the management and check the implementation of the measures taken.
(2) Upon completion of the complaint management procedure, the Complainant will have the opportunity to assess the process.

Chapter VIII

FINAL PROVISIONS

18.§ Effective date, approval

(1) In matters not regulated in detail in this Policy, the provisions of the Complaints Act shall prevail.
(2) The University shall publish this Policy on its website (www.uni-pannon.hu).
(3) This Policy was adopted by the Senate at its meeting on 30th October 2025 by Senate Resolution 167/2025. (X.30.).
(4) This Policy shall enter into force on 10th November 2025.
(5) This Policy shall be valid until revoked.
(6) Simultaneously to this Policy entering into force, „The Complaint Management Policy of the University of Pannonia" adopted by the Senate in its Resolution 37/2024. (II.22.) shall cease to have effect.

Place and date: Veszprém, 30th October 2025

Dr. János Abonyi — Zsolt Csillag

Rector — Chancellor

On behalf of the Foundation for the University of Pannonia, as Operator, approved by:

Place and date: Veszprém, 10th November 2025

Dr. Péter Bartus

Executive Director

ANNEXES:

Annex 1: Complaint Management Flowchart

