

APPROVED

11.07.2024. BIA Senate session

(protocol No. 165)

Whistleblowing procedure at the Baltic International Academy

I. General provisions

The Whistleblowing Procedure (hereinafter referred to as the Procedure) defines the procedure by which the Baltic International Academy (hereinafter referred to as the BIA) can raise an alarm in accordance with the requirements of the Whistleblowing Law and report any possible violations to the BIA that could harm public interests.

II. Whistleblowing procedure

2.1. BIA students, academic and general staff, as well as other persons, have the right to submit a report (including anonymous) about any possible violations to the BIA that may harm the public interest, ensuring anonymity and protection of the whistleblower.

2.2. The personal data of the whistleblower, the report and the accompanying written or material evidence, as well as the materials of the investigation of the whistleblower's report, are subject to the status of restricted information. The submitter's personal data is anonymized. The personal data of the whistleblower and potential violator are processed only for the purpose of ensuring the BIA's obligations to evaluate the received report, in accordance with the Whistleblowing Law.

2.3. Whistleblower reporting form is required to raise a whistleblower report to the BIA (sample in *Appendix No. 1*) and submit it:

- BIA study portal Mans BIA;
- by sending to e-mail: info.md@BIA.edu.lv;
- in person at the BIA Information Center or BIA branch.

2.4. The whistleblower's report shall state the information available to the whistleblower regarding the alleged violation, stating:

2.4.1. description of the violation and specific facts;

2.4.2. information about persons who have reason to believe that they are involved in the commission of this violation;

2.4.3. sources of obtaining information;

2.4.4 . whether this violation has already been previously reported, with a response attached if one has been received;

2.4.5. Copies of documents confirming the mentioned circumstances and facts are attached to the report, if necessary.

III. Procedure for consideration of the whistleblowing report

3.1. Upon receiving a report, the BIA Information Center registers the report, anonymizing the whistleblower's personal data and other information that could reveal the identity of the applicant , and hands it over to the Rector of the BIA for a response.

3.2. The received message is stored with limited access.

3.3. Upon receiving an anonymous submission, the BIA evaluates it on its merits and, if necessary, forwards it to the Academic Integrity and Ethics Commission of the BIA for review on its merits.

3.4. The report shall be examined no later than **within twenty working days** from the moment of receipt of the report, the examination period of which may be extended if objective necessity requires it.

3.5. The decision referred to in Article 7 of the Whistleblowing Law and the responses to the whistleblower regarding the progress of the report and the final result are signed by the rector.

3.6. If the submission is not recognized as a whistleblower report, but the submitter has indicated in the form that he wants to receive a substantive response, the Information Center makes appropriate marks on the received submission that it has not been recognized as a whistleblower report.

3.7. If, during the review of the report, it is established that there is or may be a violation, the BIA takes appropriate measures to prevent the violation or its consequences, organizes corrective action or the execution of other measures to prevent further possible violations.

3.8. If, during the review of the report, a suspicion of a violation arises, the review of which is not within the competence of the BIA, the report shall be forwarded for further consideration to the relevant state or law enforcement institution, informing the report submitter of this in writing .

3.9. After reviewing the whistleblower's report, the BIA informs the whistleblower of the facts found and the decision taken or the actions taken, if the applicant has indicated in the form that he wants to receive an answer in substance.

IV. Information confidentiality and data protection

4.1. BIA ensures that the identity of the whistleblower and the persons mentioned in the report (the person involved in the possible violation) is not disclosed. BIA responsible persons are prohibited from disclosing to third parties the personal data in their possession related to the report without a valid reason or the whistleblower's express consent, except for the case when the report is forwarded to the relevant competent authority. The information can be provided only to a person or institution that needs it for the investigation of the whistleblower's report or the violation case initiated on its basis, or for the protection of the whistleblower or related persons.

4.2. The prohibition on disclosure of information does not apply to cases where the whistleblower or a related person discloses this information himself or when the whistleblower is raised publicly.

4.3. The BIA ensures compliance with all prohibitions set forth in the Whistleblower Law regarding adverse consequences for the whistleblower.

Whistleblower Report

Addressee
<i>BIA, its structural unit or responsible person to whom you are addressing this message</i>

1. Description of the violation
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<i>Information you have about the alleged violation, indicate the specific facts or circumstances that indicate it (for example, date, place where the alleged violation was observed), the persons involved and their positions. If you have evidence (such as documents, e-mail correspondence, etc.), attach it to the report.</i>

2. Specify which public interests or which of their representatives, as well as what damage the said violation causes or can cause

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3. Have you reported the violation before
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<i>(check the appropriate one)</i>
<input type="checkbox"/> no, this is the first time reporting
<input type="checkbox"/> yes, I report at my workplace
<input type="checkbox"/> yes, I reported to another institution (specify which _____)
<input type="checkbox"/> yes, I reported at my workplace and at another institution
other information _____

Comments

4. Information on further communication and disclosure of the violation
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<i>(tick the applicable)</i>
<input type="checkbox"/> I do not want to receive an answer and/or a decision on the recognition or non-recognition of the submission as a whistleblower's report
<input type="checkbox"/> I would like to receive an answer and/or a decision on the recognition or non-recognition of the submission as a whistleblower's report
<input type="checkbox"/> permission to publish information about the detected violation, in accordance with Article 7, part nine of the Whistleblowing Law, if the report will help to detect the violation. ¹

5 . Appendices

¹The information is published without revealing the whistleblower's identity and in compliance with general personal data protection requirements, in accordance with regulatory enactments and BIA's Privacy Policy

<i>Specify the documents attached to the report that confirm the alleged violation.</i>
1. 2. ..
6. Information about the applicant
Name, surname
7. Contact information (<i>address or e-mail, phone number, etc.</i>). ²
8. Date of filing

- *Reporting only about infringement of personal interests is not considered as whistleblowing.*
- *If the report is not recognized as a whistleblower's report according to the requirements of the Whistleblowing Law, it will be considered as a private person's submission or the BIA will act according to the content of the report, and you will be informed accordingly.*
- **By submitting this report, I certify that I consider the information provided in it to be true, that I act in good faith and that I understand that the deliberate provision of false information is not considered whistle-blowing and that I can be held responsible in accordance with the relevant regulations.**

_____ (signature, transcript)

² in accordance with the requirements of the Law on Submissions