

Procedure for reporting irregularities through the whistleblowing channel of

Faculdade de Ciências da Universidade de Lisboa (Ciências ULisboa)

(Free translation from the official version, in Portuguese, for informational purposes only)

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1. Object and scope

This procedure aims to detect any irregular practice or conduct, ensuring the necessary corrective actions, due accountability, and ensuring a response to the whistleblower, under the terms of the applicable legislation, promoting the transparency of the work processes in the Faculty and the continuous improvement of operations.

Any member of Ciências ULisboa, regardless of the nature of the relation or hierarchical position, including situations in which the established relationship has in the meantime ceased or has not been established, service providers and suppliers, may communicate through the whistleblowing channel situations or procedures that violate the applicable regulations, the defined policies, technical errors which may be detrimental to the interests of third parties, including acts of corruption and related crimes.

2. Legal framework

2.1 General

In accomplishing its mission and tasks, Ciências ULisboa acts in accordance with the following reference framework:

“Constituição da República Portuguesa” - published in the Official Journal no. 86/1976, Series I, 10th April, in its current version;

Principles stated in “Carta Ética da Administração Pública”: principle of public service; principle of legality; principle of justice and impartiality; principle of equality; principle of proportionality; principle of collaboration of proportionality; principle of collaboration and good faith; principle of information and quality; principle of loyalty; principle of integrity; principle of competence and responsibility.

General principles of administrative activity stated in “Código do Procedimento Administrativo” Decree Law no. 4/2015, of 7th January, in its current version.

“Código de Conduta e Boas Práticas da Universidade de Lisboa” - Order no. 6441/2015, of 9th June; and “Código de Conduta da Universidade de Lisboa” – Order no. 4573/2020, of 15th April;

“Estatuto de Auditoria Interna de Ciências ULisboa”, which establishes the mission, competences and responsibilities of the Internal Audit and Quality Office (GAIQ); and the “Código de Ética”, which defines principles and standards of conduct with a view to promotion of an ethical culture, to ensure credibility and trust in the exercise of the attributions of GAIQ – Order D/9/2022, of 18th February.

2.2 Specific

Legislation that created the National Anticorruption Mechanism (MENAC) and approved the General Regime for Prevention of Corruption (RGPC) - DL n.º 109-E/2021, of 9th December - under which the entities must develop a regulatory compliance programme with the aim of preventing, detecting and sanctioning acts of corruption and related infractions, consisting, among other items, of a whistleblowing channel and the implementation of an internal control system that includes: the organisational plan, policies, methods, procedures controls defined by those responsible, the prevention of situations of illegality, error, corruption and fraud, as well as measures to prevent situations of conflict of interest.

Legislation that approved the General Regime for the Protection of Whistleblowers (RGPDI)- Law no. 93/2021, of 20th December – which transposed into national law the Directive (EU) 2019/1937 of the European Parliament and of the Council, of 23rd October, on the protection of persons who report violations of European Union law.

Law No. 19/2008, of 21 April, in its current version, which approves measures to combat corruption, specifically Article 4 under the heading "Whistleblower Guarantees".

3. Coordination of the procedure

The procedure for reporting irregularities through the whistleblowing channel is coordinated by the Internal Audit and Quality Office, under the terms foreseen in the procedure's description sheet, which contains a workflow that represents all the tasks developed, the sequences, interactions, responsibilities, control activities and deadlines to be observed.

4. Submission and processing of communications

The management of whistleblowing processes is based on the principles of the truth of the facts, transparency, impartiality and objectivity, while safeguarding confidentiality.

Complaints must be submitted in written form, through the preferential channel <https://denuncias.ciencias.ulisboa.pt>, duly published on the SCIENCES page. The form made available for this purpose allows the complaint to be presented anonymously or by identifying the author, indicating name, email address or other means of contact.

Complaints may also be sent by post to the Coordinator of the Internal Audit and Quality Office, Building C4 (room 4.1.18), indicating that it is confidential.

In case of anonymity, it will only be possible to contact the whistleblower, namely to submit or request information, if he/she has submitted the communication on the Whistleblowing Channel platform and saved the ID Ticket generated at the time of submission.

The whistleblower should prepare their report in a complete and substantiated manner, and describe clearly and rigorously describe the facts to which they report.

All complaints received at Ciências ULisboa are analysed together by the Ombudsman, the Administrator and the Coordinator of GAIQ, and subsequently forwarded to the Director. With the exception of the communications concerning the Director himself, which, following the abovementioned selection, are sent to the Rector of the Universidade de Lisboa.

Complaints addressed to other Faculty Bodies, namely to the Scientific Board, the Education Board and the Ombudsman, should be registered in the whistleblowing channel platform, but will be processed according to the orientation of the responsible for the Body that received the complaint.

CIÊNCIAS will keep a record of all complaints received and is obliged to keep it for the legally applicable period of time and, with regard to matters covered by the RGPD, for a period of five years and, regardless of this period, during the pendency of any judicial or administrative proceedings in relation to the complaint.

GAIQ ensures that the information received in this regard is kept confidential and secure, and guarantees the strict application of the principles of personal data protection and the processing of personal information.

5. Annual Report

The GAIQ is responsible for preparing an Annual Report with data on the complaints received, progress made and solutions implemented, including, namely, the number of complaints registered; the typification; summary of the content of the irregularity communications received; measures adopted within the scope of the irregularity communications received; corrective actions/improvements introduced.

The GAIQ will send the Annual Report to the Board of Directors (Director, Sub-directors and administrator) for approval, by 31st January of the following year.

6. Final Provision

Changes to the operating rules of the whistleblowing channel, will have to be approved by the Director and will give rise to a new version of the report.

7. Approval

As established in the regulations that define the integrated quality assurance systems of the Universidade de Lisboa and the Faculdade de Ciências ULisboa, the Director is responsible for approving the Manual of Procedures.

The official version, in Portuguese, was approved by the Director on 21 June 2024 and is available at this [link](#).