	MARIE CURIE ALUMNI ASSOCIATION WHISTLEBLOWING CHANNEL POLICY
	VERSION 1.0 FROM JULY 2023

Disclosure: Without restrictions, to all Members of the Marie Curie Alumni Association.

1. Framework

The Marie Curie Alumni Association (MCAA) is an international non-profit organization established and supported by the European Commission but entirely run by volunteer members and with a bottom-up approach at its core.


The MCAA members have in common to benefit or have benefitted from MSCA funding, therefore sharing a strong background in research. The organization praises diversity and the potential positive impact spread as a community in all areas of society. The MCAA offers lifelong career development support, networking, and advocacy, effectively extending the once-obtained MSCA support into a benefit for the entire career of former fellows with the aim of benefiting the whole society.

Therefore, the vibrant MCAA community brings together all career stages from all disciplines, encouraging networking and cooperation, making the MCAA a forum of debate between researchers, former researchers, and with the society. The organization is a major platform for MSCA alumni to contribute to shaping science Policy in Europe, providing career development opportunities, and supporting the wider research community on topics affecting research and researchers' lives, inclusive of all derived career paths.

In this context, the Whistleblowing Channel was designed as a way of enhancing MCAA's mission and values, following international best practices, as well as legislation in force (European Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019).

The procedure for reporting unethical behaviors and unethical behaviors and irregularities described in this Policy governs the procedures for receiving, sorting, treating and filing those by the MCAA in the matters within its scope.

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For reporting unethical behaviors and unethical behaviors and irregularities and other unethical behaviors and irregularities, the Whistleblowing Channel is made available on the date this Policy is approved.


2. Scope

The Whistleblowing Channel Policy applies to all MCAA Members, Governing Bodies (such as the Board, Chapter Chairs, Working Group Chairs, Committees Members, and others with governing responsibilities), and third parties, namely partners, suppliers, service providers and any other stakeholder that may interact with the organization throughout its activity.

In this context, unethical behaviors and irregularities are deemed to be all acts or omissions, wilful or seriously negligent, which are attributed to the conduct of individuals that belong to MCAA membership or Members of its Governing Bodies. Reports can be related to the following topics:

- Robbery (with violence)
- Theft (without violence)
- Money laundering
- Terrorism financing
- Other violations of the MCAA code of conduct
- Fraud
- Corruption
- Harassment
- Bullying
- Discrimination
- Abuse of power
- Conflict of interests
- Human rights
- Other topics not described above

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The respective definitions of these concepts can be found in the Annex within this Policy.

Once the organization aims to promote its Members protection throughout their career path during their MSCA funding and afterwards, the MCAA Whistleblowing Channel will also include within its scope the reporting of unethical behaviors and irregularities that MCAA Members may suffer during their career in other institutions where they conduct research. To understand the limitations of this type of usage, please read point 11 Limitations (p.11).

3. Guiding principles

The MCAA Whistleblowing Channel has the following guiding principles:

3.1. *Independence and autonomy*

The procedures for receiving, screening, analysing, concluding and filing reports of unethical behaviors and irregularities ensure that they are processed in an independent, autonomous and impartial manner, excluding from the investigation and decision-making process any persons who actually or potentially have a conflicting interest with the situation being reported.

3.2. *Good faith*


All communications shall be made in accordance with the principle of good faith and with appropriate justification. The deliberate or unreasonable misuse of the MCAA Whistleblowing Channel may constitute an offence of a disciplinary, civil or criminal nature.

3.3. *Anonymity*

The author of the communication may, if he/she so wishes, opt for anonymity, selecting this option in the MCAA Whistleblowing Channel questionnaire when making the report. Choosing to maintain anonymity does not invalidate the possibility to provide documentation to support the facts reported, which may be submitted while using the MCAA Whistleblowing Channel.

3.4. *Confidentiality*

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All reports will be kept and treated confidentially by the team responsible for the operational management of the MCAA Whistleblowing Channel.

Confidentiality will always be guaranteed, including in situations where disclosure of information is required under applicable law, in the context of further investigations by competent authorities or subsequent judicial proceedings.

The MCAA ensures the protection of personal data and information relating to the whistleblower, the subject of the report or third parties contained in the communication, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and other data protection legislation.


3.5. Non-retaliation

The MCAA shall not dismiss, threaten, suspend, repress, harass, withhold or suspend payment of salaries/fundings/grants or other benefits, demote, transfer or take any retaliatory measure against anyone who legally uses the MCAA Whistleblowing Channel or to those who provide any information or assistance in the analysis of the unethical behaviors and irregularities reported. Thus, these communications cannot, in themselves, serve as grounds for the initiation of any disciplinary, civil or criminal proceedings in relation to the author of the communication.

4. Whistleblowing Channel's Governance

The Governance of the MCAA Whistleblowing Channel is attributed to the MCAA Ethics Committee. The composition of this Committee is described in the MCAA Ethics Committee Regulation. This Committee will ensure that all reports that are received, the screening of those, and its potential investigation and filing are carried out with impartiality and independence. In the event of a potential conflicting situation with one or more constituents of the MCAA Ethics Committee, those constituents will be replaced by external members, and with the remaining

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members of this body will address the situation to carry out the actions needed for specific reports.

The responsibilities inherent to the MCAA Whistleblowing Channel operation of the MCAA Ethics Committee are detailed in point 8 of this Policy.

5. Processes

5.1. Means of communication

Communication of unethical behaviors and irregularities may be submitted in writing or verbally. To this end, participation should be carried out through specific channels, which ensure, in an appropriate manner, the receipt, processing and filing of communications, namely:


- [Online form](#);
- Request for a meeting (presential or online) with the MCAA Ethics Committee using the email ethics@mariecuriealumni.eu;

All communications received will be analysed and follow the approved process flow.

In the MCAA Whistleblowing Channel, the author of the communication shall answer a set of questions, indicating:

- Whether or not they wish to opt for anonymity;
- The type of event to report according to the defined scope of the MCAA Whistleblowing Channel;
- The situation being reported, as well as the individuals involved, the time and place of the event;
- How the whistleblower became aware of the situation, its recurrence and whether the incident is still occurring;
- Whether the whistleblower discussed the situation with someone at MCAA Governing Bodies.

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The author of the communication may attach any documentation supporting the reported situation.

Reports made with the online form will be registered on the platform that serves that purpose. In the event of requesting a meeting with the MCAA Ethics Committee, the details of that meeting shall be recorded in writing by the MCAA Ethics Committee.

5.2. Who can make communications

Under this Policy, the following may report unethical behaviors and irregularities:

a) MCAA members and Governing Bodies who, by virtue of the duties they perform, become aware of a situation that is defined within the Scope of this Policy;


B) Third parties namely partners, suppliers, service providers and any other stakeholder that may interact with the organization throughout its activity.

5.3. Description of the procedure (receiving, sorting, processing, concluding, reporting)

The procedure for reporting unethical behaviors and irregularities adopted by the MCAA is characterised by 5 main phases:

- A. Reception of the communication;
- B. Screening;
- C. Investigation;
- D. Conclusion and filing;

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A. After a submission of a report, all members of the MCAA Ethics Committee will receive a notification regarding the reception of a new report received. That report shall be recorded in a physical and/or digital way that can be accessed only by those members.

If the report identifies one or more member(s) of the MCAA Ethics Committee, those members must excuse themselves from the process and the remaining members must invite the same number of independent members.


In the event that all members of the MCAA Ethics Committee are identified in the report, the MCAA Board must invite an equal number of independent members to proceed to that report.

B. Throughout the screening of the communication’s details, the MCAA Ethics Committee will determine whether it is appropriate to proceed to the investigation phase. At this phase, reports that fall out of scope will be concluded and filed. All communications of potential or real unethical behaviors and irregularities reported through the MCAA Whistleblowing Channel will be analysed. This analysis will start the process, which may or may not culminate in the opening of an investigation.

According to the law, authors of the communications will receive a confirmation of their submission once the report is submitted. Whistleblowers have the possibility to create a password during their submission. This password is essential for individuals’ queries regarding their report. Losing the password will make it impossible to ask questions about a report. Whistleblowers have the possibility to ask questions about the status of the report or to add extra information related to a report previously made by using the [MCAA Report Status Channel](#).

In the event of reports made verbally the authors of the report will be requested to provide, if allowed by them, a contact to be contacted during the analysis and

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investigation phase. Besides the MCAA Ethics Committee, contacts that are provided will be kept confidential.

The confirmation of the reception of the communication does not presume that it will proceed to the investigation phase.

In case of loss of the access code, the author may create a new communication or contact the Ethics Committee through the other available means (see point 5.1 of the Policy).


Once the screening of the reported situation is complete, the MCAA Ethics Committee may (i) close the case if it is found that the report is manifestly unfounded or that there is no irregularity or (ii) trigger an investigation and due diligence procedures deemed necessary to assess the legitimacy of the grounds for the communication, from which a final conclusion will be drawn.

- C. The investigation phase shall start when the MCAA Ethics Committee decides that there are enough arguments to investigate the details of one report.

Each investigation can be conducted internally or by requesting the support of an external entity.

In the event of conducting an investigation with the support of an external entity, the MCAA Ethics Committee must ensure that this body is the sole owner of the data and

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that the external entity is only acting within the limitations that are required for such activity of investigating the details of the report.

The MCAA Ethics Committee shall be responsible for drawing up a report, through which it shall state the reasons that led to the conclusion of the process, as well as, if applicable, the respective corrective measures.

The investigation may result in the need to send the file originating from the irregularity report to the competent authorities.

For all communications made through the MCAA Whistleblowing Channel, the MCAA shall provide, if requested by the authors of the report, feedback about the status within a maximum of 3 months from the acknowledgement of receipt.

In the event of an anonymous report, authors of reports will be informed that they will need to provide the safety code to receive the information about the status of it, and if that is not possible, those cannot have such information.


- D. After an investigation is concluded, the MCAA Ethics Committee shall record it and observe whether there is the need to suggest corrective measures to the MCAA Board.

Those corrective measures shall be sent to the MCAA Board annually, whenever is necessary, and by an official document such as a report.

After the conclusions are finished, the documentation of each case shall be filed in a safe way according to the law.

The MCAA Ethics Committee may prepare a document periodically to report to the MCAA Board the number of reports, the types, and other information that seem relevant.

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The MCAA Board may share this information with the MCAA Active Members and other relevant stakeholders such as the MSCA or the European Commission. In all shared documentation, anonymity must be ensured in order to protect authors of reports.

6. Personal data and data retention

The information reported under the procedures for reporting unethical behaviors and irregularities will be used exclusively for the purposes set out in this Policy, in strict compliance with the provisions of the Personal Data Protection legislation.

Supporting documentation and data collected during the preliminary analysis and investigation shall be filed in a confidential and secure manner, as described in the Internal Regulations of the Integrity Committees. Security measures will be adopted in the storage of information, in order to restrict its access to authorised persons only.

7. Entry into force

This Policy shall enter into force on the day of its approval. The MCAA Whistleblowing Channel Policy shall be disclosed to its Members by means they can access whenever they need.

8. Repeals

Not applicable.

9. Revision


This Policy shall be reviewed and adjusted according to changes in legislation and/or MCAA's needs regarding the reporting of unethical behaviors and irregularities.

10. Links of interest

[MCAA Code of Conduct](#)

[MCAA Ethics Committee](#)

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11. Limitations

The MCAA Whistleblowing Channel is specific for reporting unethical issues and wrongdoing within the MCAA. However, issues that MCAA members suffer or observe throughout their research career may be reported using this channel if the following assumptions are observed, namely:

- a. The member that wishes to report any wrongdoing addressed the matter through a channel in the institution where the issue occurred and no follow-up was received in a legal timely manner (i.e., legal timings were not followed);
- b. The member that wishes to report any wrongdoing does not have any channel in the institution that ensures their anonymity and the confidentiality of the report;
- c. The member that wishes to report any wrongdoing is acting on good faith and has explored the possibilities to report the matter in a legal way but was not successful;
- d. The member that wishes to report any wrongdoing has a strong conviction that they may suffer retaliation from an institution.

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