
Urban Research Institute

Governance Document

Whistleblowing Policy





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I. Introduction

1. URI acknowledges whistleblowing of wrongdoing in relation to its activity to have a critical role in the fulfillment of its commitment to core values, and ultimately, in the fulfillment of its mission towards and in cooperation with internal and external parties.

II. Purpose

2. URI establishes its whistleblowing policy with the purpose of:
 - a. facilitating and encouraging reporting of wrongdoing in relation to its activity,
 - b. enabling identification and addressing of wrongdoing in relation to its activity,
 - c. enabling redressing of wrongdoing in relation to its activity,
 - d. reducing the risk of wrongdoing in relation to its activity.

III. Scope

3. The whistleblowing policy in URI applies to the reporting of suspected violation or risk of violation of wrongdoings, as recognized from URI in the Code of Values and Ethics, and categorized as follows:
 - a. Serious wrongdoing, such as fraudulent activities, embezzlement of funds, instances of corruption, financial mismanagement jeopardizing organizational stability, safety violations endangering the well-being of employees or the general public, environmental misconduct resulting in harm to ecosystems or communities, or breaches of legal or regulatory requirements exposing the organization to legal liabilities or sanctions.
 - b. Persistent issues within URI, such as patterns of discrimination based on race, gender, ethnicity, or other protected characteristics, recurring instances of harassment or bullying in the workplace, or environmental problems like pollution or unsustainable practices that persist despite internal efforts to address them.
 - c. Misconduct by leaders, including unethical behavior or abuse of power by senior executives, members of the General Assembly, or managers, which may not be adequately addressed through standard internal channels.
 - d. Concerns affecting external stakeholders, ranging from product safety issues impacting affecting the broader community, to partnerships or collaborations with entities engaging in unethical or harmful activities.
 - e. Violations of national or international laws, encompassing URI's operations within its operating jurisdictions.
4. The reporting of suspected impact or risk of impact of URI's activity on the environment and social and gender dimension is the scope of the complaints and grievance management policy supporting the Environment and Social Policy and the Gender Policy of URI.
5. The protection of the whistleblower applies to reporting on reasonable grounds. The protection of the whistleblower does not apply to reporting which, through independent investigation, is determined to have had no reasonable grounds and to have not been in good faith.

IV. General principles

6. URI shall not tolerate wrongdoing in relation to its activity.
7. URI shall not tolerate retaliation against the whistleblower of a wrongdoing in relation to its activity.
8. URI shall keep confidential the identity of a whistleblower, as well as of their close family members and associates.
9. URI shall take all measures within its capacities to protect a whistleblower who has made a report with reasonable belief that information or evidence of the report provided is true, otherwise in good faith.
10. A whistleblower reports suspected wrongdoing or risk of wrongdoing as soon as possible after becoming aware of it.
11. Reporting of suspected wrongdoing or risk of wrongdoing in no way protects a whistleblower from the investigation on their own wrongdoing.

V. Management process

12. The management of whistleblowing at URI comprises the process of:
 - a. receiving the report,
 - b. assessing the report and need for protection of the whistleblower,
 - c. addressing the report and the protection of the whistleblower,
 - d. concluding the case.

VI. Authority within URI

13. The Executive Director is the first level authority for whistleblowing management.
14. The Board of Directors is the second level authority for whistleblowing management.
15. The Head of the General Assembly is the third level authority for the whistleblowing management.

VII. Authority outside URI

16. The national-level authorities responsible for whistleblowing management are:
 - a. the High Inspectorate for Declaration and Control of Assets and Conflict of Interest (HIDCACI);
 - b. the State Police;
 - c. Financial Intelligence Agency, and
 - d. the Prosecutor's Office of the Republic of Albania.

VIII. Reporting from a whistleblower

17. The whistleblowing policy in URI applies to:
 - a. the reporting from any individual or entity who is an internal part of the activity of URI, comprising:
 - i. the governing level: members of the General Assembly, Board of Directors and committees of the Board of Directors,
 - ii. the management level: the Executive Director,
 - iii. the implementation level: the employees, sub-contracted for implementation,

- partners in implementation, interns, volunteers,
- b. the reporting from any individual or entity who is externally related to URI's activity in any of the following relationships:
 - i. beneficiary of URI's programmes and projects,
 - ii. impacted from URI's programmes and projects,
 - iii. applying for the implementation of URI's programmes and projects,
 - iv. applying for employment at URI,
 - v. participating in URI's activity.
18. Any entity who is internally related to URI's activity shall apply a whistleblowing policy by international standards; this obligation is subject to regulation in the legal agreements between URI and the entity; the entity shall inform URI on any whistleblowing case related to the agreed activities subject to a legal agreement.
 19. A suspected wrongdoing or risk of wrongdoing related to URI's activity can be reported to the organization or any of the authority levels within URI through these channels:
 - a. in person
 - i. first level of authority: Zana Vokopola, Executive Director
 - ii. second level of authority: Zinaida Leskaj, Head of RAC of the Board of Directors
 - iii. third level of authority: Arjan Gjatoja, Head of the General Assembly
 - b. via e-mail
 - i. to the organization: info@uri.org.al
 - ii. first level of authority: zvokopola@uri.org.al
 - iii. second level of authority: zinaida.leskaj@yahoo.com
 - iv. third level of authority: arjan.gjatoja@hotmail.com
 - c. via mobile telephone
 - i. to the organization: +355 4 224 5546
 - ii. first level of authority: +355 694082942
 - iii. second level of authority: +355 6909464004
 - iv. third level of authority: +355 692077772
 - d. via mail
 - i. to the official URI address: Street "e Barrikadave", building 14K, 4th floor, ap. 44, Tirana, 1057, directed to any of the authority levels
 - e. on-line form
 - i. on the webpage of URI
 20. A suspected wrongdoing or risk of wrongdoing related to URI's activity can be reported anonymously to any of the authority levels within URI through the on-line form channel. Reports sent anonymously will be treated with the utmost confidentiality, and the identity of the reporter will not be disclosed.
 21. Whistleblowing reports involving a member of the General Assembly, the Board of Directors, the Risk and Audit Committee, the Executive Director, or their respective

immediate family members shall be made to the Head of General Assembly who shall bring any such report to the attention of the General Assembly.

22. The member of the General Assembly or their respective immediate family members involved in the whistleblowing report shall recuse him/herself from the deliberations of the General Assembly meeting.
23. If a whistleblowing report involves the Head of the General Assembly, the other members shall elect another Head to facilitate the deliberations.

IX. Whistleblowing management process

Receiving the report

24. The whistleblower shall provide where possible any information or evidence in their possession that would support a reasonable belief that wrongdoing may have occurred. Prior to making a report, such persons or entities are not required to evaluate or to determine whether a report that they intend to make meets any threshold of seriousness or gravity.
25. In order to assist the successful conduct of investigations, reports should be as specific as possible. To the extent possible, they should include such details as:
 - a. The type of suspected wrongdoing;
 - b. When, where, and how the suspected Wrongdoing occurred; and
 - c. Who was involved and may have knowledge of the matters being reported.
26. Relevant documents or other evidence should be included with the report or provided as soon as possible. However, the absence of any of the details above should not prevent reporting, nor shall it prevent the Executive Director or the General Assembly from investigating reports of suspected Wrongdoing.
27. Any individual or entity who is an internal or external part of the activity of URI who intend to report suspected wrongdoing and who are uncertain about the rules regarding reporting, or regarding any matter covered by this Policy, may seek confidential advice from the Executive Director or the Head of the General Assembly.

Assessing the report

28. Upon receipt of a report, the following steps will be taken:
 - a. Acknowledging receipt of the report and providing initial feedback to the whistleblower to assure them that the matter is being taken seriously.
 - b. Initiating an immediate assessment of the reported issue to determine the appropriate course of action.
29. Reports of suspected wrongdoing will be assessed based on the following criteria: (i). the nature and severity of the alleged misconduct. (ii). the credibility and reliability of the information provided. (iii). the potential impact on stakeholders and the organization. (iv). any previous history or patterns of misconduct related to the reported issue. (v). any additional evidence or corroborating information available.
30. The assessment of reports will be conducted in a fair, impartial, and confidential manner. The process will involve: (i). reviewing the details provided in the report and gathering additional information as necessary. (ii). evaluating the credibility of the whistleblower and any witnesses involved. (iii). assessing the potential risks and implications of the reported misconduct. (iv). determining the need for immediate protection measures for the whistleblower, if applicable. (v). documenting the assessment process and findings

for transparency and accountability.

31. The assessment of the reported issue involves evaluating its severity, credibility, and potential impact. This assessment may include gathering additional information, consulting relevant policies and procedures, and considering any immediate risks or threats posed by the reported misconduct
32. The immediate appropriate course of action to be determined, may include:
 - a. initiating an investigation;
 - b. suspending individuals involved in the reported misconduct from their roles or responsibilities temporarily to prevent further harm;
 - c. securing relevant documents or evidence to prevent tampering or destruction;
 - d. implementing additional controls or safeguards to prevent recurrence of similar incidents;
 - e. providing support or protection to whistleblowers or other affected parties;
 - f. communicating with relevant stakeholders to inform them of the situation and any actions being taken to address it;
 - g. in instances where reports of suspected wrongdoing are determined not to fall under the authority of the Executive Director or the General Assembly, they may refer to the Chair of the Ethics and Audit Committee as appropriate;
 - h. in instances that the assessment reveals that the report lacks reasonable grounds or sufficient evidence to warrant further investigation, the Executive Director or the General Assembly may dismiss the report;
 - i. in cases where the reported misconduct may involve violations of laws or regulations, the organization will notify relevant authorities as required by law. This notification will be made promptly and in accordance with legal obligations and ethical considerations; or
 - j. other.

Implementing an investigation

33. The Executive Director or the General Assembly shall treat seriously and thoroughly investigates reports of suspected wrongdoing in a manner that is independent, objective, and conducted with scrupulous adherence to the principles of fairness and due process. Investigations will be initiated as soon as practicable after the matter has been reported.
34. The Executive Director or the General Assembly may also engage external investigators, if necessary, to assist in conducting fair and impartial inquiries.
35. The Executive Director or the General Assembly, depending on the nature and severity of the reported misconduct, initiates the selection process for hiring external investigators, by identifying reputable investigation firms or individuals with expertise in conducting fair and thorough inquiries.
36. Reports will be thoroughly investigated to gather relevant evidence and determine the validity of the allegations.
37. The investigation process will involve but not limited to:
 - a. Appointing qualified and impartial investigators to conduct a fair and objective inquiry if deemed necessary.
 - b. Interviewing relevant parties and collecting documentary evidence to corroborate

- or refute the reported misconduct.
- c. Analyzing findings and determining appropriate remedial actions or disciplinary measures, if warranted.
 - d. Communicating investigation outcomes to the whistleblower and providing feedback on the actions taken in response to the report.
38. During the investigation and resolution process, comprehensive protection measures will be implemented to safeguard the whistleblower from retaliation or harm.
 39. The effectiveness of the procedures for addressing reports and protecting whistleblowers will be regularly monitored and evaluated. Feedback from whistleblowers, stakeholders, and relevant authorities will be solicited to identify areas for improvement and enhance the organization's whistleblowing management system.
 40. The Executive Director or the General Assembly may request other persons to cooperate in investigations, who shall provide information or evidence which they believe to be true.
 41. If the report is not anonymous, the Executive Director or the General Assembly will contact the whistleblower to discuss the investigation process and any other matters that are relevant to the investigation.
 42. If the report is not anonymous, the Executive Director or the General Assembly will contact the whistleblower to discuss the investigation process and any other relevant matters. However, where the whistleblower has chosen to remain anonymous, his/her identity will not be disclosed to the investigator or any other person. Instead, the Executive Director or the General Assembly will conduct the investigation based solely on the information provided. In both cases, the Executive Director or the General Assembly will provide feedback on the progress and expected timeframes of the investigation where possible.
 43. The Executive Director or the General Assembly may inform the whistleblower and/or a person against whom allegations have been made of the findings. the Executive Director or the General Assembly will document the findings in a report however any report will remain the property of the URI and will only be shared with the whistleblower or any person against whom the allegations have been made if the URI deems it appropriate
 44. Subject to protections available, all parties referred to paragraph 20 have a duty to cooperate (such as by providing information, evidence, or testimony) in investigations of suspected wrongdoing. For URI Personnel, this duty is not subject to the authorisation of or clearance by any Supervisor or other person, or Unit of the URI, and failure to cooperate may result in disciplinary measures as applicable in line with the Albanian Labour Code.

Concluding the case

45. Decisions regarding the resolution of whistleblowing cases will be made based on the following considerations:
 - a. compliance with organizational policies, procedures, and relevant laws.
 - b. alignment with ethical standards and principles of fairness and equity.
 - c. protection of the whistleblower and other affected parties from retaliation or harm.
 - d. accountability and transparency in the decision-making process.
46. If the investigation confirms the allegations of misconduct, appropriate remedial actions

or disciplinary measures will be taken. These may include:

- a. Implementing corrective measures to address the root causes of the misconduct and prevent its recurrence.
 - b. Imposing disciplinary sanctions, such as warnings, suspension, demotion, or termination of employment, based on the severity of the misconduct and the individual's level of involvement.
 - c. Providing restitution or compensation to affected parties to address any harm or damages caused by the misconduct.
 - d. Notify relevant authorities as required by law in cases where the reported misconduct may involve violations of laws or regulations. This notification will be made promptly and in accordance with legal obligations and ethical considerations.
47. The outcomes of whistleblowing cases, including any remedial actions or disciplinary measures taken, will be communicated to relevant parties in a timely and transparent manner. This communication will:
- a. Inform the whistleblower of the resolution of the case and any actions taken to address their concerns.
 - b. Provide updates to stakeholders on the organization's response to reported misconduct and its commitment to accountability and integrity.
 - c. Maintain confidentiality as necessary to protect the privacy and safety of individuals involved in the case.
48. If, upon exhaustive investigation, the Executive Director or the General Assembly determines that the allegations in a whistleblowing report are unsubstantiated or false, the report may be dismissed. The decision to dismiss the report shall be communicated to the whistleblower along with the reasons for dismissal. Any individual or entity involved in the investigation shall be informed of the outcome.
49. All decisions, actions, and outcomes related to concluding whistleblowing cases will be documented. This documentation will serve as a record of the organization's commitment to addressing misconduct and promoting a culture of transparency and accountability.

X. Reporting and Investigation of Retaliation

50. Any Whistleblower who believes that he or she may suffer or has suffered from retaliation as a consequence of whistleblowing reporting or for cooperating in the investigation should report this concern to the Executive Director or the General Assembly through the channels provided in paragraph 22 and 23, as appropriate.
51. Reporting and investigation of retaliation follows the same rules and procedures as per whistleblowing reporting.
52. Where, in the context of a challenge to an act or decision of the URI, a whistleblower who is URI Personnel, has made a prima facie case of retaliation by demonstrating that he or she has reasonable belief that his or her report of suspected wrongdoing or cooperation with an investigation into wrongdoing, is or was a contributing factor in the taking of the challenged detrimental action or decision by the URI, the burden of proof shall shift to the URI to show, by clear and convincing evidence, that the same action would have been taken or threatened in the absence of the report or cooperation.
53. When assessing whether an individual or entity has engaged in retaliation against a whistleblower, the Executive Director or the General Assembly competent for the

relevant investigation shall assess whether:

- a. the whistleblower has made a prima facie case of retaliation by demonstrating that he or she has reasonable belief that his or her report of suspected wrongdoing, or cooperation with an investigation into wrongdoing, is or was a contributing factor in the taking or threat of the challenged detrimental action by such individual or entity; and
- b. such individual or entity has shown, by clear and convincing evidence, that the same action would have been taken or threatened in the absence of the report or cooperation.

XI. Protections and Remedies for Whistleblowers

54. Any person may submit a report of suspected wrongdoing anonymously. Whistleblowers may request confidentiality regarding their identity, the identity of their close family member(s) or associate(s), and specific information conveyed at, during, or after an investigation. The Executive Director or the General Assembly will honour confidentiality requests to the extent possible within the legitimate needs of investigation.
55. The Executive Director and the General Assembly will protect the identities of and confidential information provided by whistleblowers from unauthorized disclosure before, during, and after an investigation as far as possible using all available means, including physical, electronic, and procedural controls.
56. The Executive Director and the General Assembly will, during an investigation, take appropriate measures to protect the confidentiality of any non-public information associated with an investigation, and will take appropriate measures to prevent the unauthorized disclosure of investigative findings. Under certain circumstances, the Executive Director or the General Assembly may also keep confidential the identities of investigators involved in an investigation.
57. In cases where the disclosure of confidential information may be legitimately necessary to pursue an investigation, the Executive Director and the General Assembly shall secure the explicit consent of whistleblowers, and any other party to an investigation to whom confidentiality has been granted.
58. In exceptional circumstances, the URI may disclose confidential information when such disclosure is required of the URI in judicial proceedings or to meet other legal obligations such as those imposed by law enforcement authorities, or when the URI pursues sanctions or disciplinary actions in response to a report which has been determined as being false and malicious. In such eventualities, the URI shall inform the whistleblower, or any other party protected about the need for disclosure, within a reasonable timeframe prior to the disclosure.
59. The Executive Director or the General Assembly will have access to investigation files and records, and the authority to determine whether such files and records, unedited or redacted, may be disclosed to individuals on a need-to-know basis and subject to their obligation to keep confidentiality.
60. The whistleblower, who signals a wrongdoing is protected against any retaliatory measures taken against him by the organization, including, but not limited to:
 - a. dismissal from work;
 - b. suspension from work or one or more duties;
 - c. demotion;

- d. reduction of salary and/or financial rewards;
 - e. failure to rise to office;
 - f. removal of the right to participate in trainings;
 - g. negative evaluations in the work relationship; and
 - h. other forms of retaliation related to work.
61. Whistleblowers will be accorded, at their request, protection without delay, before, during the course of and pursuant to a review or investigation as necessary to safeguard their safety and well-being.
62. The URI shall endeavour to ensure that external Individual and entities are protected from retaliation. Internal or external individuals who are found to retaliate against external whistleblowers may be subject to sanctions in accordance with any legal agreements which may be concluded between the URI and the external individuals or entity.
63. Where an external individual or entity, his or her close family member(s) or associate(s) may or does suffer retaliation because of a report of suspected wrongdoing or cooperation with an investigation, the URI shall endeavour to secure necessary protection and to employ other reasonable measures to reduce the risks of retaliation.

XII. Reporting to National Authorities

64. All internal and external individuals or entities may also make a disclosure to the authorities in chapter VII, responsible for managing whistleblowing in relation to a wrongdoing.
65. Protections against retaliation shall be extended to internal and external individuals or entities who reports suspected wrongdoing to an entity outside of the URI.

XIII. Communication, Capacity Building, and Cooperation

66. The Executive will proactively make known and communicate widely this and other integrity policies and procedures of the URI to internal and external individuals and entities and other stakeholders through all available means and as far as possible. It shall ensure that channels for reporting suspected wrongdoing are easily accessible and available, as far as possible in the English and Albanian languages.
67. To further the effective implementation of this Policy, the Executive Director will facilitate integrity training.
68. In commitment to the effective implementation of this Policy, URI is committed to continuous capacity building to strengthen the management of whistleblowing. At the core of this commitment lies the integration of specialized training sessions designed to empower the Executive Director and General Assembly members with the necessary expertise to proficiently and confidentially address whistleblowing reports.
69. The Executive Director or the General Assembly shall closely cooperate to prevent and investigate suspected wrongdoing with all URI partners.

XIV. Policy Administration, Monitoring, Reporting, and Review

70. The Executive Director shall maintain a case registry of reports of suspected wrongdoing with all the documentation produced within this Policy, and in accordance with legal requirement for information disclosure.
71. The Ethics and Audit Committee shall monitor and review the implementation of this



Policy and the effectiveness of whistleblower protection in URI-related Activities. The Executive Director and the General Assembly shall engage with the Internal Auditor to independently evaluate the effectiveness of this Policy's implementation within the Internal Audit's Work Plan.

72. The Ethics and Audit Committee present a report to the Board on issues related to the implementation of this Policy along with any recommendations for changes to it. Such reports will take into account a review of the effectiveness of the Policy and new whistleblower protection standards or policies developed and implemented by peer institutions and partners regarding the range of their activities.

XV. Effective Date

73. This Policy shall come into effect upon the approval of the General Assembly.

