

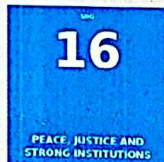


Grand Asian University, Sialkot

Whistleblowing & Complaint Policy

(2025)

ALIGNED WITH UNITED NATIONS
Sustainable Development Goals 2030



SDG 16

PEACE, JUSTICE AND STRONG INSTITUTIONS

Promote peaceful and inclusive societies for sustainable development, provide access to justice for all

Document Reference

GAUS/Reg/WBP/2025

Approved Date

2025

Version

Version 1.0

Review Cycle

Annual



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WHISTLEBLOWING & COMPLAINT POLICY

The Whistleblowing and Complaint Policy shall come into force with immediate effect for all programmes of the Grand Asian University Sialkot (GAUS) and shall be applicable to all faculty members, staff, students, and associated third parties.

1.1 PURPOSE

To provide a safe, confidential, and structured mechanism for all members of the Grand Asian University Sialkot (GAUS) community to raise genuine concerns about misconduct, malpractice, corruption, or violations of university policy, without fear of retaliation. This Policy has been formulated in compliance with the National Accountability Ordinance (NAO) 1999, the Prevention of Electronic Crimes Act (PECA) 2016, HEC Institutional Integrity Guidelines, and the Islamic principle of Amr bil Ma'ruf wa Nahy 'an al-Munkar (enjoining what is right and forbidding what is wrong).

1.2 SCOPE

This Policy applies to all members of the GAUS community and covers concerns relating to any activity conducted on university premises, in the name of the university, or in connection with university functions, including:

- i. All full-time, part-time, visiting, and contractual faculty members;
- ii. All administrative, support, and technical staff;
- iii. Students enrolled in any degree, diploma, or certificate programme;
- iv. Vendors, contractors, partners, and agents acting on behalf of the University;
- v. Members of governing and advisory bodies.

This Policy covers concerns including but not limited to: corruption, bribery, financial mismanagement, academic malpractice, harassment, data breaches, health and safety violations, and any other breach of GAUS policy or applicable law.

1.3 DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

- i. "Whistleblower" means a member of the GAUS community who in good faith reports a genuine concern about misconduct, malpractice, or a policy violation.
- ii. "Complaint" means a formal expression of dissatisfaction or concern submitted by any member of the community regarding a specific act or omission by an individual or department.
- iii. "Good Faith" means an honest, genuine belief that the concern raised is true and represents a legitimate matter of institutional interest, even if subsequently unsubstantiated.
- iv. "Retaliation" means any adverse action taken against a whistleblower as a direct or indirect consequence of having raised a concern in good faith.
- v. "Malicious Report" means a complaint made deliberately with false or misleading information, motivated by personal animosity or gain rather than genuine concern.
- vi. "Whistleblowing Committee" means the committee established under this Policy to receive, investigate, and adjudicate whistleblowing complaints.



- vii. "Appellant Committee" means the committee to which an affected party may appeal against the decision of the Whistleblowing Committee.
- viii. "University" means the Grand Asian University Sialkot (GAUS).
- ix. "Vice Chancellor" means the Vice Chancellor of the University.
- x. The general pronoun "he" and its derivatives imply either gender.

1.4 KEY POLICY STATEMENTS

The following key statements shall govern whistleblowing and complaint handling at GAUS:

Encouragement to Report:

- i. All members of the GAUS community are encouraged and expected to raise genuine concerns about misconduct or malpractice at the earliest opportunity.
- ii. Raising a concern under this Policy is an act of institutional responsibility consistent with the Islamic duty of Amr bil Ma'ruf wa Nahy 'an al-Munkar.
- iii. Concerns may be raised in writing, verbally, or anonymously through the designated reporting channels.

Confidentiality:

- iv. The identity of the whistleblower shall be kept strictly confidential to the greatest extent possible consistent with conducting a fair and thorough investigation.
- v. Only those directly involved in the investigation shall have access to the whistleblower's identity, and only where strictly necessary.
- vi. Disclosure of a whistleblower's identity without their consent shall itself constitute a disciplinary offence under this Policy.

Protection Against Retaliation:

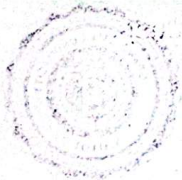
- vii. No member of the GAUS community shall suffer any adverse consequence, including dismissal, demotion, disciplinary action, harassment, or intimidation, as a result of having raised a concern in good faith under this Policy.
- viii. Any act of retaliation against a whistleblower shall be treated as a serious disciplinary offence and addressed accordingly.
- ix. A whistleblower who believes they have been subjected to retaliation shall report this immediately to the Registrar's Office, which shall initiate a separate investigation.

Malicious Reports:

- x. This Policy does not protect individuals who knowingly make false, misleading, or malicious complaints.
- xi. A person found to have submitted a malicious report shall be subject to disciplinary action in accordance with Section 1.11 of this Policy.

1.5 APPOINTMENT OF COMMITTEES

- i. In the second quarter of every alternate year, the competent authority shall appoint a committee on the recommendation of the Academic Council, to be known as the Whistleblowing Committee, to deal with all complaints received under this Policy.
- ii. The Appellant Committee shall also be appointed by the competent authority on the recommendation of the Academic Council.
- iii. Both committees shall be reconstituted as required in the event of a conflict of interest or unavailability of members.



1.6 COMPOSITION OF COMMITTEES

- i. The Whistleblowing Committee shall comprise five members in total, including four faculty members not less than the rank of Assistant Professor and the Director HR as Member and Secretary.
- ii. The Appellant Committee shall comprise two senior faculty members and the Registrar as Member and Secretary.
- iii. No member of either committee shall have a personal interest in the matter under consideration.

1.7 POWERS OF WHISTLEBLOWING COMMITTEE

- i. The Committee shall have the authority to interview or record the statements of the complainant, respondent, witnesses, staff members, or any other persons directly or indirectly concerned with the complaint.
- ii. The Committee shall have the power to cross-examine any statement submitted to it.
- iii. The Committee shall be permitted access to all relevant documents, digital records, financial data, correspondence, and any other material or device pertaining to the case.
- iv. The Committee shall be permissible to conduct one or more than one session to investigate and probe the matter.
- v. The Committee shall have the power to recommend one or more than one penalty.

1.8 POWERS OF APPELLANT COMMITTEE

- i. The Appellant Committee shall have power to further probe the case.
- ii. The Appellant Committee shall have authority to retain, increase, or decrease any decision or recommendation already given by the Whistleblowing Committee.
- iii. The Appellant Committee shall communicate its decision to both parties and to the Vice Chancellor and Whistleblowing Committee within thirty (30) days of the appeal being received.

1.9 CONDUCT PROCEDURE

The following procedure shall be observed upon receipt of a complaint under this Policy:

Reporting:

- i. All complaints shall be submitted to the Secretary of the Whistleblowing Committee (Registrar) on the prescribed Complaint Form, along with any supporting evidence or documentation.
- ii. Anonymous complaints may be submitted via the dedicated whistleblowing email address or anonymous drop-box maintained by the Registrar's Office.
- iii. The Secretary shall acknowledge all complaints within 48 working hours and assign a case reference number.
- iv. At the end of every semester, the Secretary shall produce a 'Nil' certificate if no complaints have been received during that period.

Investigation:

- v. The Secretary of the Whistleblowing Committee shall convene the first meeting of the Committee within fifteen (15) days of receipt of the complaint.
- vi. The Committee shall present and review all reported cases, probe all matters, and issue its recommendations within thirty (30) days of the first sitting.



- vii. The quorum for a meeting of the Committee shall be a minimum of three members.
- viii. Where members of the Committee disagree, the majority's finding shall be regarded as the decision of the Committee.
- ix. In the event all members disagree among themselves, the case shall be referred to the Vice Chancellor, who shall have the power to decide the case or refer it to the competent authority.

Decision & Notification:

- x. The recommendations and report of the Committee shall be submitted to the Vice Chancellor, who shall have power to accept, reject, or modify the recommendations.
- xi. In light of the recommendations or Vice Chancellor's decision, the Registrar's Office shall publish the final notification and communicate it to all concerned parties.

1.10 RIGHT OF APPEAL

The affected party shall have the right to submit an appeal against the first decision to the Appellant Committee within fifteen (15) days of publication of notification, failing which the first decision shall be considered as the final decision.

1.11 IMPOSITION OF PENALTIES

The following penalties may be imposed upon a finding of misconduct under this Policy, singly or in combination:

- i. Formal written warning recorded in the personal file;
- ii. Mandatory training or counselling;
- iii. Demotion or withholding of increment or promotion;
- iv. Suspension from duties or academic activities for a defined period;
- v. Termination of employment or expulsion from the University;
- vi. Debarment from future engagement with GAUS in any capacity;
- vii. Cash penalty may be imposed from PKR 10,000 to an amount equivalent to one semester's fee;
- viii. Referral to NAB, FIA, or other competent authority for criminal proceedings, where applicable;
- ix. In the case of a malicious complaint, the complainant shall be subject to the same range of penalties as detailed above;
- x. Any other penalty as deemed appropriate by the Vice Chancellor in light of the circumstances of the case.

1.12 MONITORING & COMPLIANCE

- i. The Registrar's Office shall maintain a centralized and confidential register of all complaints received, their status, and outcomes.
- ii. A quarterly anonymized report on complaint volumes and categories shall be submitted to the Vice Chancellor.
- iii. All cases shall be tracked from receipt to final resolution; pending matters beyond sixty (60) days shall be escalated to the Vice Chancellor.
- iv. Non-compliance with this Policy shall be addressed through the GAUS disciplinary process.



1.13 REVIEW & AMENDMENT

- i. This Policy shall be reviewed annually by the the Registrar's Office and Legal Office.
- ii. All amendments shall be aligned with current HEC guidelines and applicable national legislation.
- iii. Proposed amendments shall be submitted to the Vice Chancellor for approval before coming into effect.
- iv. The revised Policy shall be communicated to all stakeholders and updated on the GAUS official website within fifteen (15) days of approval.

Prepared By: Registrar's Office, GAUS

Signature: _____

Date: _____



Approved By: Vice Chancellor, GAUS

Signature: _____

Date: _____