



KARADENİZ TECHNICAL UNIVERSITY POLICY ON THE PROTECTION OF PERSONS REPORTING DISCRIMINATION

PURPOSE OF THE POLICY

This policy has been prepared to prevent persons who report allegations of discrimination, harassment or inequality within Karadeniz Technical University (KTU), witness such reports, or participate in related administrative or judicial proceedings from being subjected, because of their applications, to disadvantage, pressure or retaliation with respect to their education and employment rights. It aims to ensure that reports are handled securely, that individuals' freedom to seek remedies is protected, and that review processes are conducted fairly.

RELEVANCE OF THE POLICY

Related Sustainable Development Goal (SDG) Criterion: This policy is primarily associated with the following United Nations Sustainable Development Goals;

- SDG 4 (Quality Education)
- SDG 5 (Gender Equality)
- SDG 8 (Decent Work and Economic Growth)
- SDG 10 (Reduced Inequalities)
- SDG 16 (Peace, Justice and Strong Institutions)

Related Metrics:

- THE Impact Rankings / Sustainability Impact Ratings (SDG 5, indicator 5.6.8)
- UI GreenMetric (evidence of institutional sustainability policies and practices)

SCOPE OF THE POLICY

This policy applies across KTU campuses; faculties, institutes, schools, vocational schools, application and research centers, hospitals and laboratories; as well as field studies, internships, distance education and social activities organized by the University. Students, academic and administrative staff, contract employees, applicants, visitors and service providers are within the scope. Protection covers persons making reports themselves, witnesses, participants in proceedings and, to the extent permitted by legislation, their representatives.

BASIC PRINCIPLES AND LEGAL BASIS

- **Prohibition of Retaliation and Victimisation:** No adverse action may be taken in relation to grading, thesis and examination processes, scholarships, internships, recruitment, assignment of duties, promotion, performance appraisal, contract renewal or access to services because of a report.
- **Confidentiality and Data Minimisation:** Identity information, statements and evidence may be accessed only by persons authorized as required by their duties. Subject to legal obligations, disclosures are kept limited to the purpose and proportionate.
- **Right to Good-Faith Reporting:** The fact that an allegation is not substantiated at the end of the review does not, by itself, constitute grounds for a sanction or adverse treatment against the applicant. Every report is assessed without prejudice and on the basis of facts.
- **Impartiality and Procedural Safeguards:** Persons with a conflict of interest are not assigned to the review or decision-making stages of the case; the rights of the applicant and the person reported against, including the right of defence and other rights arising from legislation, are observed.



- **Accessibility and Prevention of Secondary Victimization:** Application, support and information channels are kept accessible; unnecessary repetition of statements or measures of a punitive nature toward the applicant are avoided.
- **Legal Framework:** The Constitution of the Republic of Türkiye, Article 4(2) of Law No. 6701 (victimisation), the applicable provisions of Laws No. 2547, 657, 4857, 6698 and 3071, and relevant KTU regulations shall be taken as the basis.

RESPONSIBILITIES AND ROLES

- **Rectorate and Senate:** The Senate is responsible for approval and revision of the policy; the Rectorate ensures its implementation, referral to authorized review bodies, evaluation of necessary temporary protective measures and institutional oversight.
- **General Secretariat:** It coordinates the registration and referral process of official applications submitted to the Rectorate while observing access restrictions; it does not disclose the applicant's identity to unrelated units.
- **Authorized Disciplinary Supervisors and Academic/Administrative Units:** They examine allegations within the framework of their authority and relevant legislation and implement measures to prevent retaliation in the educational or working environment. In the event of a conflict of interest, the case is referred to the higher competent authority.
- **Personnel Department and Student Affairs Department:** Within their respective areas of responsibility, they carry out registration, monitoring and corrective actions, in coordination with the competent authorities, to ensure that personnel and student procedures are not adversely affected because of an application.
- **Office of Legal Counsel:** It provides the Rectorate and relevant administrative units with institutional legal opinions on applicable legislation, procedural safeguards and possible legal proceedings; this shall not be construed as undertaking personal legal representation.
- **Personal Data Protection Unit:** It guides the relevant units on administrative measures compliant with Law No. 6698 for the processing, access authorization, storage and secure sharing of report files.
- **Department of Health, Culture and Sports - Psychological Counseling and Guidance Unit:** Within its existing service capacity, it provides students and staff who request it with confidential psychological counseling and, where needed, appropriate referral.
- **Women and Family Studies Application and Research Center (KAÇAUM) and Disadvantaged Groups Unit:** Within their areas of expertise, they develop recommendations concerning awareness, accessibility and support needs; they do not replace disciplinary investigations.

IMPLEMENTATION STEPS

1. **Publication and Information:** The policy is published in an accessible format on KTU institutional webpages; the right to report, confidentiality and the prohibition of retaliation are explained during student and staff orientation.
2. **Secure Application and Registration:** Reports may be submitted to the Rectorate by official petition or through the institutional application channels in force. Rights to apply to competent authorities are reserved. Access to case files in the registration system is restricted on a role-based basis; secure application procedures are announced by the Rectorate.
3. **Preliminary Assessment and Information:** The aim is to provide acknowledgement/registration information within five business days to applicants whose contact information is available and to conduct a preliminary assessment in terms of the nature of the incident, jurisdiction and urgency. Statutory application and investigation periods are reserved.
4. **Urgent Protective Measures:** When a serious risk of retaliation is reported, the risk is assessed within no more than one business day; where necessary, proportionate temporary measures such



as assigning an alternative evaluator, limiting communication contact or arranging a safe working/learning environment are decided by the relevant authority.

5. **Impartial Review:** The application is referred to the authorized and competent review bodies. The confidentiality of the applicant, the right of defence of the persons concerned and the security of evidence are protected; the person against whom the allegation is made, or biased persons in a close hierarchical relationship, do not conduct the review.
6. **Support and Process Monitoring:** Upon request, psychological counseling and guidance on institutional regulations are provided. Changes occurring after the report in the applicant's courses, examinations, research, internship and working conditions are also reviewed in terms of retaliation risk.
7. **Finalisation and Corrective Measures:** For identified violations, administrative/disciplinary processes and remedial measures are implemented in accordance with the legislation. The applicant is informed about the outcome of the process with due regard to confidentiality and the rights of third parties; rights of appeal and external application are preserved.
8. **Continuous Improvement:** Records of reports, allegations of retaliation, measures taken, processing time and training are monitored after separating personal data; feedback is used in reviewing implementation.

PERFORMANCE INDICATORS

Indicator	Target	Verification Source
Rate of timely acknowledgement/registration notification	≥ 95% within five business days for applications with contact information	Rectorate/General Secretariat records
Rate of preliminary assessment of urgent retaliation risk	100% within one business day for reports of serious risk	Authorized review and measure records
Rate of decisions on necessary protective measures	≥ 90% within five business days following risk determination	Rectorate and relevant unit decisions
Separate recording of retaliation allegations	100% of annual applications	Confidential application monitoring records
Review of access authorization in case files	At least one review annually; target for verified unauthorized disclosure: 0	Personal Data Protection Unit / relevant records
Protection and confidentiality training for relevant responsible staff	≥ 90% of relevant staff by 2028	Personnel Department, KAÇAUM, HCS training records
Anonymized implementation assessment	At least one report per year	KTU annual monitoring and sustainability reports

MONITORING AND REPORTING

- **Monitoring Frequency:** Performance indicators are reviewed annually; urgent risks and decisions on protective measures are monitored on an application-by-application basis. A decrease in the number of complaints alone is not considered an indicator of success; safe reporting and process quality are evaluated together.
- **Reporting Frequency:** Annual aggregated results are incorporated into the appropriate KTU sustainability/institutional reports within the first six months of the following year. Data that could reveal individuals' identities are not used in relevant evidence submissions, including THE Impact Rankings.
- **External Verification:** Evidence required for legal audits or international reporting is shared with legally authorized recipients while protecting personal data security. Any decision on external verification under this policy is taken by the competent University bodies.



- **Revision Conditions:** If 80% of the performance targets are not achieved for two consecutive years, if a verified serious case of retaliation or a data breach is identified, or if legislation/international criteria change, the responsible units review the policy and submit the proposed amendment to the Senate for approval.

ENTRY INTO FORCE

This policy enters into force on the date it is approved by the KTU Senate. The competent units of the University implement the provisions of the policy within the framework of the legislation in force and their defined duties.