



# ANTIDISCRIMINATION POLICY

December, 2024.

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## **1. Purpose and Scope**

The purpose of this Policy is to promote equality, inclusion, and dignity for all members of Universum International College (UNI). This Policy applies to **all academic and administrative staff, students, contractors, and visitors** across all UNI campuses.

## **2. Policy Statement and Zero Tolerance**

Universum International College (UNI) maintains a zero-tolerance stance toward any form of discrimination, harassment, bullying, victimization, or exclusion in any of its academic, sports or social activities in its campuses; and outreach activities.

## **3. Definitions**

UNI adopts the United Nations' definition of discrimination that states that discrimination is any distinction, exclusion, or preference that has the effect of nullifying or impairing equality of opportunity or treatment. This can be based on a wide range of characteristics such as race, colour, sex, religion, political opinion, national or ethnic origin, age, disability, sexual orientation, and others, and can occur in political, economic, social, cultural, or any other field of public life. It is seen as an offense to human dignity and an obstacle to peace and security. Further definitions are provided in Appendix A.

## **4. Objectives**

- 4.1 Prevent and eliminate all forms of discrimination, harassment, and victimization.
- 4.2 Ensure fair and equitable treatment for all stakeholders.
- 4.3 Guarantee the right to equal pay for equal work.
- 4.4 Respect parental rights and provide access to parental leave.
- 4.5 Promote human dignity by prohibiting child labor and human trafficking.
- 4.6 Provide clear and confidential reporting mechanisms.
- 4.7 Foster awareness, education, and accountability.

## **5. Guiding Principles**

Equity, Equality, Diversity, Inclusion, Transparency, Accountability, and Confidentiality.

## **6. Roles and Responsibilities**

- Institutional Governance – Approves and monitors this Policy.
- General Administration – Oversees compliance and investigations.
- Academic Administration – Ensures inclusive environments in the classrooms and reports any deviation.
- General Administrative Staff – Treat others with respect and report violations.
- Faculty – Treat others with respect and report violations.
- Students – Report incidents and uphold respect.
- Antidiscrimination Committee – Handles complaints and evaluates effectiveness.

## **7. Implementation Measures**

UNI will implement this Policy through training, inclusive recruitment, accessible facilities, curriculum integration, and awareness campaigns.

## **8. Complaint and Redress Mechanisms**

Outlined steps for informal and formal complaints, confidentiality, appeal process, and non-retaliation clause.

## **9. Monitoring, Evaluation and Reporting**

UNI will conduct annual equality audits and prepare reports for continuous improvement.

## **10. Compliance, Enforcement and Disciplinary Actions**

Violations of this Policy constitute misconduct and are subject to disciplinary measures which will be determined by the Antidiscrimination Committee.

## **11. Related Policies and Legal References**

This Policy aligns with national legislation, international standards, and institutional documents, including Kosovo's equality laws and UN conventions.

**National Legislation:**

- Law on Protection from Discrimination No. 05/L-021
- Law on Gender Equality No. 05/L-020
- Labor Law No. 03/L-212
- Child Protection Law No. 06/L-084

**International Instruments:**

- UN International Convention on the Elimination of All Forms of Racial Discrimination (1966)
- UN Convention on the Elimination of All Forms of Discrimination against Women (1979)
- ILO Convention on the Worst Forms of Child Labour (1999)
- UN Strategy on Protection from Violence and Discrimination against LGBTIQ+ Persons (2024)

**Institutional References:**

- Universum International College Statute 612/1
- Gender Equality Plan 2022–2027 (172/1)
- Academic Staff Handbook (2942/1)
- Guide for Academic and Administrative Staff (1722/1)
- Policy on Procedures and Disciplinary Measures (2949/1)

**12. Review and Amendment**

Reviewed every three (3) years or sooner as needed by the Antidiscrimination Committee and Vice President for Academic Affairs.

**13. Approval and Endorsement**

Approved by: Dr. Isabel Salvat

Vice President for Academic Affairs

Date: December 2024.

Next Review Date: December 2027

**14. APPENDIX A: Definitions**

Bullying – Repeated unreasonable behavior that demeans or intimidates.

Child Labor – Hazardous or age-inappropriate work for children.

Forced Labor – Work exacted without consent.

Gender Equality – Equal rights and protections for all genders.

Harassment – Unwanted conduct violating dignity.

Human Trafficking – Exploitation through force or coercion.

Modern Slavery – Forced labor or marriage.

Reasonable Accommodation – Adjustments ensuring equal participation.

Right to Appeal – Internal right to challenge administrative decisions.

Victimization – Retaliation for filing or supporting complaints.

## ANNEX 1

### COMPLAINT AND REDRESS MECHANISM

#### 1. Purpose

The Complaint and Redress Mechanism (CRM) establishes clear, transparent, and confidential procedures for addressing any incident of discrimination, harassment, bullying, or victimization within **Universum International College (UNI)**.

It ensures that all members of the community have equal access to justice, support, and redress in alignment with UNI's Antidiscrimination Policy, national legislation, and international human rights standards.

#### 2. Scope

This mechanism applies to all **students, academic and administrative staff, contractors, and visitors** at all UNI campuses. It covers any discriminatory act or behavior related to:

- Employment or recruitment
- Academic evaluation or participation
- Access to facilities or services
- Interpersonal behavior within the UNI community
- Institutional decisions or practices

#### 3. Principles

All complaints and investigations are guided by the following principles:

- **Confidentiality** – Information will be kept secure and shared only with those directly involved in handling the complaint.
- **Impartiality** – All parties will be treated fairly, without bias or conflict of interest.
- **Non-retaliation** – Retaliation against complainants, witnesses, or investigators is strictly prohibited.
- **Timeliness** – Complaints will be addressed promptly and efficiently.

- **Accessibility** – Procedures shall be simple, clear, and accessible to all members of the community.
- **Fairness and Dignity** – All individuals involved will be treated with dignity and respect throughout the process.

**4. Reporting Channels**

UNI provides **multiple confidential channels** for submitting complaints:

1. **Email:** [antidiscrimination@universum-ks.org](mailto:antidiscrimination@universum-ks.org)
2. **Online Form:** Secure online submission via the UNI internal platform.
3. **In-Person:** Directly to the Antidiscrimination Committee or the Office of Student Services.
4. **Written Report:** Sealed, signed complaint submitted to the HR Office or Campus Administration.

Anonymous complaints will be accepted; however, investigation outcomes may be limited if insufficient information is provided.

**5. Types of Complaint**

<b>Type</b>	<b>Description</b>	<b>Examples</b>
<b>Informal Complaint</b>	For minor incidents where resolution through dialogue, mediation, or awareness is possible.	Miscommunication, insensitive remarks, unintentional bias.
<b>Formal Complaint</b>	For serious or repeated incidents requiring investigation and possible disciplinary action.	Harassment, discrimination, exclusion, victimization, or retaliation.

## **6. Complaint Procedure**

### **6.1 Informal Procedure**

1. The complainant may seek advice or mediation from the **Antidiscrimination Committee** or an appointed mediator.
2. If both parties agree, mediation will aim for a voluntary resolution within **ten (10) working days**.
3. A brief confidential summary will be kept for monitoring purposes.

### **6.2 Formal Procedure**

If the matter cannot be resolved informally or the complainant chooses a formal route:

1. **Submission:**
  - o The complaint is submitted in writing via one of the channels in Section 4.
  - o It must include names, dates, description of events, and desired outcomes.
2. **Acknowledgment:**
  - o The **Antidiscrimination Committee** acknowledges receipt within **five (5) working days**.
3. **Preliminary Review:**
  - o The Committee conducts an initial assessment within **ten (10) working days** to determine admissibility and jurisdiction.
4. **Investigation:**
  - o A formal investigation begins, including interviews, evidence collection, and confidentiality measures.
  - o Both complainant and respondent are given equal opportunity to present their account.
  - o Investigation should be completed within **thirty (30) working days**.
5. **Findings and Decision:**
  - o The Committee issues a written report with findings and recommendations to the **Vice President for Academic Affairs** or **Human Resources Department**.
  - o Appropriate actions may include mediation, counseling, training, or disciplinary measures.

**6. Notification:**

- Both parties receive a written outcome within **five (5) working days** of the final decision.

**7. Appeal:**

- Either party may appeal in writing to the **Vice President for Academic Affairs** within **fifteen (15) working days** of receiving the decision.
- The appeal must specify reasons and evidence of procedural or factual error.

**7. Protection and Support**

- **Non-retaliation:** Any form of retaliation against complainants, witnesses, or investigators will result in disciplinary action.
- **Confidential Counseling:** Free confidential counseling is available through the UNI Support Office.
- **Reasonable Accommodation:** Adjustments will be made for individuals with disabilities or other needs during the complaint process.

**8. Record-Keeping and Data Protection**

All complaint files, reports, and communications will be securely stored and accessible only to authorized personnel.

Personal data will be processed in accordance with the **UNI Data Protection Policy** and **EU GDPR standards**.

**9. Monitoring and Reporting**

The **Antidiscrimination Committee** will maintain a confidential register of all complaints and resolutions.

An **annual report** summarizing trends, outcomes, and policy recommendations will be submitted to the **Institutional Governance Council** to guide preventive measures and continuous improvement.

## 10. Review

This Mechanism shall be reviewed every **three (3) years** or sooner, if necessary, alongside the Antidiscrimination Policy, to ensure relevance and effectiveness.

## 11. Responsible Authority

The **Antidiscrimination Committee**, in cooperation with the **Vice President for Academic Affairs** and the **Human Resources Department**, is responsible for implementation, monitoring, and evaluation of this Mechanism.



A handwritten signature in black ink, appearing to read "Isabel Salvat", is written over a horizontal line.

**Prof. Dr. Isabel Salvat**  
*Vice President for Academic Affairs & Dean*

*Chair of the Academic Council*



**UNIVERSUM INTERNATIONAL COLLEGE (UNI)**

**FORMAL COMPLAINT FORM – ANTIDISCRIMINATION POLICY**

*\*Confidential – For official use only\**

Effective Date: December 2024 | Next Review Date: July 2027

**1. Complainant Information**

Full Name: \_\_\_\_\_

Position / Role (Student, Staff, Visitor, etc.): \_\_\_\_\_

Department / Faculty: \_\_\_\_\_

Contact (Email / Phone): \_\_\_\_\_

Preferred Method of Contact: \_\_\_\_\_

Do you wish to remain anonymous?  Yes  No

**2. Respondent Information (if known)**

Name: \_\_\_\_\_

Position / Department: \_\_\_\_\_

Relationship to complainant: \_\_\_\_\_

**3. Incident Details**

Date(s) of Incident(s): \_\_\_\_\_

Location: \_\_\_\_\_

Description of Incident (attach additional pages if needed):

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**4. Type of Complaint (check all that apply)**

- Discrimination    Harassment    Bullying    Victimization    Retaliation    Human Trafficking / Forced Labour    Other (specify): \_\_\_\_\_

**5. Witnesses (if any)**

Name	Role / Department	Contact (Email/Phone)
_____	_____	_____

**6. Steps Already Taken (if any)**

(e.g., reported informally, mediation, prior complaint)

\_\_\_\_\_

\_\_\_\_\_

**7. Desired Outcome / Remedy Requested**

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**8. Confidentiality and Consent**

- I confirm that the information provided is true to the best of my knowledge.
- I consent to UNI processing this information for investigation purposes in line with UNI's Data Protection Policy and GDPR.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**For Official Use Only**

Complaint Received by:	_____
Date Received:	_____
Reference Number:	_____
Assigned Investigator(s):	_____
Resolution & Date:	_____

## **GUIDELINES FOR COMPLETING THE COMPLAINT FORM**

**Purpose & Confidentiality:** This form records formal complaints related to discrimination, harassment, bullying, or victimization under UNI policy. All info is confidential and shared only with authorized personnel.

**Submission:** Submit via email ([antidiscrimination@universum-ks.org](mailto:antidiscrimination@universum-ks.org)), online portal, or in-person to Antidiscrimination Committee or HR Office.

**Follow-up:** Acknowledgment within 5 working days; investigation updates according to Complaint and Redress Mechanism timelines.

**Support:** Contact UNI Support Office for confidential advice or assistance.

**Anonymous Complaints:** Accepted, but may limit the investigation due to lack of identifiable information.

**Data Protection:** Processed according to GDPR and UNI Data Protection Policy.